Office of the Mayor-President
Purchasing Division

City of Baton Rouge
Parish of East Baton Rouge
222 St. Louis Street, 8th Floor, RM 826
P.O. Box 1471
Baton Rouge, Louisiana 70821

225/389-3259 FAX 225/389-4841
purchasinginfo@brgov.com

Kris R. Goranson
Director of Purchasing

October 20, 2021

ADDENDUM NO. 2

City of Baton Rouge
Parish of East Baton Rouge

20008-A21-15
Wastewater Treatment Plant Biosolids Hauling Services

Proposal Submission Deadline: October 27, 2021

Closing Time: 2:00 p.m.

Your reference is directed to **RFP 20008-A21-15 – Wastewater Treatment Plant Biosolids Hauling Services,** which is scheduled to open at 2:00 p.m., C.S.T. on October 27, 2021.

- This addendum provides responses to written questions submitted during the Inquiry Period. Please see attached Questions and Responses document.

This addendum is hereby officially made a part of the referenced solicitation and should be acknowledged.

REQUEST FOR PROPOSAL NO. 20008-A21-15-Wastewater Treatment Plant Biosolids Hauling Services

Questions and Responses
(Addendum No. 2)

Q1. Who is the current service provider and what is their pricing?

A1. Tradebe Environmental Services, LLC is the current service provider. A copy of the current pricing schedule is included in Appendix A of this addendum.

Q2. How long has the contract been in place?

A2. October 27, 2017

Q3. Can the previous bid tabulation for this contract be provided?

A3. A copy of the current pricing schedule is included in Appendix A of this addendum.

Q4. Please confirm that all biosolids hauled will be dewatered via belt filter press.

A4.Yes there are belt filter presses at both facilities. There are plans to replace the belt filter presses at the SWWTP with screw presses within the next two years which should result in equal or lower water content in the sludge from that facility.

Q5. Please confirm that the 25,000 wet tons/year is the combined estimated total from both wastewater treatment plants.

A5. Confirmed.

Q6. How many tons were hauled from each WWTP in 2020?

A6. Approximately 5,582 tons were hauled from the NWWTP and 19,593 were hauled from the SWWTP.

Q7. Will all biosolids hauled meet Class B for land application to include meeting Vector Attraction Reduction (VAR) requirements?

A7. No.

Q8. Does the City/Parish have any land base permitted?

A8. City-Parish is only permitted to dispose biosolids at the North Landfill.

REQUEST FOR PROPOSAL NO. 20008-A21-15-Wastewater Treatment Plant Biosolids Hauling Services

Questions and Responses
(Addendum No. 2)

Q9. What restrictions exists, if any, for the hours of operation and hauling services at each facility?

A9. The treatment plants are manned 24 hours a day. No reasonable request for site access will be denied. The North Landfill is open between 5:30 a.m. and 5:30 p.m. on Monday through Fridays; and 5:30 a.m. to 3:00 p.m. on Saturdays; closed on Sundays.

Q10. Will the City/Parish be loading the Contractor's trailers? If so, how will loading be optimized so that the trailers are not underloaded or overloaded?

A10. City-Parish will be loading the Contractor's trailers. City-Parish can load the trailers as best as possible, but are limited to the existing infrastructure in place (i.e. Belt Press building dimensions – length of bays, location of chute, height of building above the loading area). NWWTP currently has a configuration with more flexibility to load trailers evenly. SWWTP has more limitations that will exist until future construction changes the layout for optimal trailer loading.

The Contractor should take this into account when selecting trailers to aid in optimization; especially for trailers provided for the SWWTP. The Contractor is also encouraged to be present on site as often as desired to establish the most desired levels of filling.

Q11. Does any means exist at either site to evenly load the Contractor's trailers?

A11. See previous answer.

Q12. Does a truck scale exist at either site?

A12. No

Q13. Who will be responsible for testing/obtaining approval and paying the tip fees for the landfill?

A13. Biosolids for the NWWTP and SWWTP are permitted for disposal at the North Landfill and require no additional testing/approval. If Contractor considers another method an/ or location of disposal, the requirements of 8.4 apply. The hauler is responsible for paying the tipping fees at the North Landfill which are $28 per ton.

Q14. Please further clarify Section 8.11 Price Schedule. In the example given, the interpolation calculation appears questionable. If pricing for hauling 300 tons/week is $40/ton and for hauling 250 tons/week is $50/ton, why would the calculated price for hauling 275 tons/week be less than either at $30/ton?

A14. There was an error in the example calculation. The calculated cost in the example should be $45 / wet ton. The example calculation shall be deleted in its entirety and replaced with the following.

Per ton cost for hauling 300 wet tons in a calendar week:	$40/wet ton
Per ton cost for hauling 250 wet tons in a calendar week:	$50/wet ton
Actual wet ton hauling quantity for a calendar week:	275.34 wet tons
Rounded to the nearest whole number:	275 wet tons
Interpolated per wet ton cost per calculation below:	$30 /wet ton

$$\frac{Calculated\ Cost - Cost\ \#1}{Acual\ Wet\ Tons - Wet\ tons\ at\ Cost\ \#1} = \frac{Cost\ \#2 - Cost\ \#1}{Wet\ tons\ at\ Cost\ \#2 - Wet\ tons\ at\ Cost\ \#1}$$

$$\frac{Calculated\ Cost - \$40}{275\ wet\ tons - 300\ wet\ tons} = \frac{\$50 - \$40}{250\ wet\ tons - 300\ wet\ tons}$$

$$\frac{Calculated\ Cost - \$40}{-25\ wet\ tons} = \frac{\$10}{-50\ wet\ tons}$$

$$\frac{Calculated\ Cost - \$40}{-1\ wet\ tons} = \frac{\$10}{-2\ wet\ tons}$$

$$\text{Calculated Cost} - \$40 = \$5$$

$$Calculated\ Cost = \$45$$

Q15. Would the City/Parish consider revising the pricing for each facility to be a single $/wet ton rate, regardless of the quantity hauled/week?

A15. The pricing schedule will remain as is.

Q16. Page 6 of the RFP states that the U.S. Postal Service does not make deliveries to the City/Parish's physical location. Can the City/Parish receive deliveries from UPS or Federal Express? If so, is either one of those delivery methods acceptable for submitting sealed proposals so long as they are received by the City/Parish prior to the due date and time?

A16. Yes, the City-Parish Purchasing Division can receive deliveries to its physical address from both UPS and Federal Express. We have no preference for either one of these courier services. The U.S. Postal Service can be used also, however mail addressed to us and sent via the U.S. Postal Services is picked up and processed through the City-Parish Mail Services, a central mailing services department, which sorts and delivers to the various City-Parish departments,

which delays the receiving of mail to our physical location of the Purchasing Division where all bids must be received and time stamped in. If a proposer chooses to use the U.S. Postal Service for the delivery of its proposal, these delays should be taken into account and acted upon accordingly when submitting a proposal. City-Parish is not responsible for any delays in the delivery method chosen by the proposer and all bids/proposals must be received in the physical address of the Purchasing Division (222 St. Louis Street, 8th Floor, Rm. 826, Baton Rouge, LA 70802) by the stated deadline in the RFP or any subsequent changed date and time provided in an addendum.

Q17. Who is your current vendor for hauling and disposal? Please provide a copy of the current contract and current price.

A17. See response to question 1. The current contract is similar to the draft contract included as Attachment D in the RFP.

Q18. How many loads per day are needed to haul out of each WWTP?

A18. The estimated amount of 25,000 wet tons is included in 8.1. Last year, 78% of the tons were produced from South Plant. Contractors must determine loads needed by the estimated amount of biosolids, amount/sizing of equipment provided, hours of disposal operation, etc.

Q19. How are the Contractor's trailers specifically loaded by the City? Are they loaded while resting on scales?

A19. There are no scales. Trailers are loaded by visual observation from ground and elevated ladders adjacent to the trailers.

Q20. What is the average weight per load that has been loaded by City personnel at each location?

A20. Through three quarters of 2021, the loads from NWWTP have averaged approximately 27 tons per load; the loads from SWWTP have averaged 22 tons per load.

Q21. Will the City be responsible for its dewatered cake to pass the paint filter test?

A21. Yes. The test is required by the existing City-Parish sludge permit.

Q22. Please provide tonnage for each plant disposed or reused by location for the past two years.

A22. NWWTP - 6,029 (2019), 5,582 (2020)
SWWTP - 17,200 (2019), 19,593 (2020)

Q23. Will a bid bond or performance bond be required?

A23. A bid bond is not required. A performance bond will be required. Add the following language to the end of Section 30 of the RFP.

The successful proposer shall be required to provide a performance (surety) bond in the amount of one hundred percent (100%) of the annual contract amount to insure the successful performance under the terms and conditions of the contract negotiated between the successful proposer and the City-Parish. The performance bond shall be subject to forfeiture for failure on the part of the successful proposer to perform its obligations under the contract.

Q24. Please confirm that Davis-Bacon wage rates do not apply to this project.

A24. The use of Davis-Bacon wage rates is not anticipated for this contract.

Q25. Please provide a copy of the current Operator's Health and Safety plan referenced in Section 8.5 Operations by Owner.

A25. Due to the limited scope of services provided on site by the Contractor (no operation of plant equipment, no entry of confined spaces, no entry of plant operational buildings, etc.), health and safety shall be governed by the proposer. Along with the PPE Program, we are asking the Contractor to follow the Storm Water Pollution Prevention Plans (SWPPPs), as relates to prevention of spills on site including biosolids from equipment, and any required repair and fueling activities. Copies of the current SWPPPs are included in Appendix B of this addendum.

Q26. Please provide a copy of the Owner's PPE Standard referenced in Section 8.7.

A26. A copy of the current PPE Program is included in Appendix C of this addendum.

REQUEST FOR PROPOSAL NO. 20008-A21-15-Wastewater Treatment Plant Biosolids Hauling Services

Questions and Responses
(Addendum No. 2)

Appendix A

Current Pricing Schedule

Quantity	Unit Price	Weekly Cost
250	$90.00	$22,500.00
251	$89.72	$22,520.77
252	$89.45	$22,541.55
253	$89.18	$22,562.32
254	$88.91	$22,583.09
255	$88.64	$22,603.87
256	$88.38	$22,624.64
257	$88.11	$22,645.41
258	$87.85	$22,666.19
259	$87.59	$22,686.96
260	$87.34	$22,707.73
261	$87.08	$22,728.51
262	$86.83	$22,749.28
263	$86.58	$22,770.05
264	$86.33	$22,790.83
265	$86.08	$22,811.60
266	$85.84	$22,832.37
267	$85.59	$22,853.15
268	$85.35	$22,873.92
269	$85.11	$22,894.69
270	$84.87	$22,915.47
271	$84.64	$22,936.24
272	$84.40	$22,957.01
273	$84.17	$22,977.79
274	$83.94	$22,998.56
275	$83.71	$23,019.33
276	$83.48	$23,040.11
277	$83.25	$23,060.88
278	$83.03	$23,081.65
279	$82.80	$23,102.43
280	$82.58	$23,123.20
281	$82.36	$23,143.97
282	$82.14	$23,164.75
283	$81.93	$23,185.52
284	$81.71	$23,206.29
285	$81.50	$23,227.07
286	$81.29	$23,247.84
287	$81.08	$23,268.61
288	$80.87	$23,289.39
289	$80.66	$23,310.16
290	$80.45	$23,330.93
291	$80.25	$23,351.71
292	$80.04	$23,372.48
293	$79.84	$23,393.25
294	$79.64	$23,414.03
295	$79.44	$23,434.80

Quantity	Unit Price	Weekly Cost
296	$79.24	$23,455.57
297	$79.04	$23,476.35
298	$78.85	$23,497.12
299	$78.66	$23,517.89
300	$78.46	$23,538.67
301	$78.27	$23,559.44
302	$78.08	$23,580.21
303	$77.89	$23,600.99
304	$77.70	$23,621.76
305	$77.52	$23,642.53
306	$77.33	$23,663.31
307	$77.15	$23,684.08
308	$76.96	$23,704.85
309	$76.78	$23,725.63
310	$76.60	$23,746.40
311	$76.42	$23,767.17
312	$76.24	$23,787.95
313	$76.07	$23,808.72
314	$75.89	$23,829.49
315	$75.72	$23,850.27
316	$75.54	$23,871.04
317	$75.37	$23,891.81
318	$75.20	$23,912.59
319	$75.03	$23,933.36
320	$74.86	$23,954.13
321	$74.69	$23,974.91
322	$74.52	$23,995.68
323	$74.35	$24,016.45
324	$74.19	$24,037.23
325	$74.02	$24,058.00
326	$73.86	$24,078.77
327	$73.70	$24,099.55
328	$73.54	$24,120.32
329	$73.38	$24,141.09
330	$73.22	$24,161.87
331	$73.06	$24,182.64
332	$72.90	$24,203.41
333	$72.75	$24,224.19
334	$72.59	$24,244.96
335	$72.44	$24,265.73
336	$72.28	$24,286.51
337	$72.13	$24,307.28
338	$71.98	$24,328.05
339	$71.83	$24,348.83
340	$71.68	$24,369.60
341	$71.53	$24,390.37

Quantity	Unit Price	Weekly Cost
342	$71.38	$24,411.15
343	$71.23	$24,431.92
344	$71.08	$24,452.69
345	$70.94	$24,473.47
346	$70.79	$24,494.24
347	$70.65	$24,515.01
348	$70.51	$24,535.79
349	$70.36	$24,556.56
350	$70.22	$24,577.33
351	$70.08	$24,598.11
352	$69.94	$24,618.88
353	$69.80	$24,639.65
354	$69.66	$24,660.43
355	$69.52	$24,681.20
356	$69.39	$24,701.97
357	$69.25	$24,722.75
358	$69.12	$24,743.52
359	$68.98	$24,764.29
360	$68.85	$24,785.07
361	$68.71	$24,805.84
362	$68.58	$24,826.61
363	$68.45	$24,847.39
364	$68.32	$24,868.16
365	$68.19	$24,888.93
366	$68.06	$24,909.71
367	$67.93	$24,930.48
368	$67.80	$24,951.25
369	$67.67	$24,972.03
370	$67.55	$24,992.80
371	$67.42	$25,013.57
372	$67.30	$25,034.35
373	$67.17	$25,055.12
374	$67.05	$25,075.89
375	$66.92	$25,096.67
376	$66.80	$25,117.44
377	$66.68	$25,138.21
378	$66.56	$25,158.99
379	$66.44	$25,179.76
380	$66.32	$25,200.53
381	$66.20	$25,221.31
382	$66.08	$25,242.08
383	$65.96	$25,262.85
384	$65.84	$25,283.63
385	$65.73	$25,304.40
386	$65.61	$25,325.17
387	$65.49	$25,345.95

Quantity	Unit Price	Weekly Cost
388	$65.38	$25,366.72
389	$65.26	$25,387.49
390	$65.15	$25,408.27
391	$65.04	$25,429.04
392	$64.92	$25,449.81
393	$64.81	$25,470.59
394	$64.70	$25,491.36
395	$64.59	$25,512.13
396	$64.48	$25,532.91
397	$64.37	$25,553.68
398	$64.26	$25,574.45
399	$64.15	$25,595.23
400	$64.04	$25,616.00
401	$63.93	$25,636.77
402	$63.82	$25,657.55
403	$63.72	$25,678.32
404	$63.61	$25,699.09
405	$63.51	$25,719.87
406	$63.40	$25,740.64
407	$63.30	$25,761.41
408	$63.19	$25,782.19
409	$63.09	$25,802.96
410	$62.98	$25,823.73
411	$62.88	$25,844.51
412	$62.78	$25,865.28
413	$62.68	$25,886.05
414	$62.58	$25,906.83
415	$62.48	$25,927.60
416	$62.38	$25,948.37
417	$62.28	$25,969.15
418	$62.18	$25,989.92
419	$62.08	$26,010.69
420	$61.98	$26,031.47
421	$61.88	$26,052.24
422	$61.78	$26,073.01
423	$61.69	$26,093.79
424	$61.59	$26,114.56
425	$61.49	$26,135.33
426	$61.40	$26,156.11
427	$61.30	$26,176.88
428	$61.21	$26,197.65
429	$61.12	$26,218.43
430	$61.02	$26,239.20
431	$60.93	$26,259.97
432	$60.84	$26,280.75
433	$60.74	$26,301.52

Quantity	Unit Price	Weekly Cost
434	$60.65	$26,322.29
435	$60.56	$26,343.07
436	$60.47	$26,363.84
437	$60.38	$26,384.61
438	$60.29	$26,405.39
439	$60.20	$26,426.16
440	$60.11	$26,446.93
441	$60.02	$26,467.71
442	$59.93	$26,488.48
443	$59.84	$26,509.25
444	$59.75	$26,530.03
445	$59.66	$26,550.80
446	$59.58	$26,571.57
447	$59.49	$26,592.35
448	$59.40	$26,613.12
449	$59.32	$26,633.89
450	$59.23	$26,654.67
451	$59.15	$26,675.44
452	$59.06	$26,696.21
453	$58.98	$26,716.99
454	$58.89	$26,737.76
455	$58.81	$26,758.53
456	$58.73	$26,779.31
457	$58.64	$26,800.08
458	$58.56	$26,820.85
459	$58.48	$26,841.63
460	$58.40	$26,862.40
461	$58.31	$26,883.17
462	$58.23	$26,903.95
463	$58.15	$26,924.72
464	$58.07	$26,945.49
465	$57.99	$26,966.27
466	$57.91	$26,987.04
467	$57.83	$27,007.81
468	$57.75	$27,028.59
469	$57.67	$27,049.36
470	$57.60	$27,070.13
471	$57.52	$27,090.91
472	$57.44	$27,111.68
473	$57.36	$27,132.45
474	$57.29	$27,153.23
475	$57.21	$27,174.00
476	$57.13	$27,194.77
477	$57.06	$27,215.55
478	$56.98	$27,236.32
479	$56.90	$27,257.09

Quantity	Unit Price	Weekly Cost
480	$56.83	$27,277.87
481	$56.75	$27,298.64
482	$56.68	$27,319.41
483	$56.60	$27,340.19
484	$56.53	$27,360.96
485	$56.46	$27,381.73
486	$56.38	$27,402.51
487	$56.31	$27,423.28
488	$56.24	$27,444.05
489	$56.17	$27,464.83
490	$56.09	$27,485.60
491	$56.02	$27,506.37
492	$55.95	$27,527.15
493	$55.88	$27,547.92
494	$55.81	$27,568.69
495	$55.74	$27,589.47
496	$55.67	$27,610.24
497	$55.60	$27,631.01
498	$55.53	$27,651.79
499	$55.46	$27,672.56
500	$55.39	$27,693.33
501	$55.32	$27,714.11
502	$55.25	$27,734.88
503	$55.18	$27,755.65
504	$55.11	$27,776.43
505	$55.04	$27,797.20
506	$54.98	$27,817.97
507	$54.91	$27,838.75
508	$54.84	$27,859.52
509	$54.77	$27,880.29
510	$54.71	$27,901.07
511	$54.64	$27,921.84
512	$54.58	$27,942.61
513	$54.51	$27,963.39
514	$54.44	$27,984.16
515	$54.38	$28,004.93
516	$54.31	$28,025.71
517	$54.25	$28,046.48
518	$54.18	$28,067.25
519	$54.12	$28,088.03
520	$54.06	$28,108.80
521	$53.99	$28,129.57
522	$53.93	$28,150.35
523	$53.86	$28,171.12
524	$53.80	$28,191.89
525	$53.74	$28,212.67

Quantity	Unit Price	Weekly Cost
526	$53.68	$28,233.44
527	$53.61	$28,254.21
528	$53.55	$28,274.99
529	$53.49	$28,295.76
530	$53.43	$28,316.53
531	$53.37	$28,337.31
532	$53.30	$28,358.08
533	$53.24	$28,378.85
534	$53.18	$28,399.63
535	$53.12	$28,420.40
536	$53.06	$28,441.17
537	$53.00	$28,461.95
538	$52.94	$28,482.72
539	$52.88	$28,503.49
540	$52.82	$28,524.27
541	$52.76	$28,545.04
542	$52.70	$28,565.81
543	$52.65	$28,586.59
544	$52.59	$28,607.36
545	$52.53	$28,628.13
546	$52.47	$28,648.91
547	$52.41	$28,669.68
548	$52.35	$28,690.45
549	$52.30	$28,711.23
550	$52.24	$28,732.00
551	$52.24	$28,784.24
552	$52.24	$28,836.48
553	$52.24	$28,888.72
554	$52.24	$28,940.96
555	$52.24	$28,993.20
556	$52.24	$29,045.44
557	$52.24	$29,097.68
558	$52.24	$29,149.92
559	$52.24	$29,202.16
560	$52.24	$29,254.40
561	$52.24	$29,306.64
562	$52.24	$29,358.88
563	$52.24	$29,411.12
564	$52.24	$29,463.36
565	$52.24	$29,515.60
566	$52.24	$29,567.84
567	$52.24	$29,620.08
568	$52.24	$29,672.32
569	$52.24	$29,724.56
570	$52.24	$29,776.80
571	$52.24	$29,829.04

Quantity	Unit Price	Weekly Cost
572	$52.24	$29,881.28
573	$52.24	$29,933.52
574	$52.24	$29,985.76
575	$52.24	$30,038.00
576	$52.24	$30,090.24
577	$52.24	$30,142.48
578	$52.24	$30,194.72
579	$52.24	$30,246.96
580	$52.24	$30,299.20
581	$52.24	$30,351.44
582	$52.24	$30,403.68
583	$52.24	$30,455.92
584	$52.24	$30,508.16
585	$52.24	$30,560.40
586	$52.24	$30,612.64
587	$52.24	$30,664.88
588	$52.24	$30,717.12
589	$52.24	$30,769.36
590	$52.24	$30,821.60
591	$52.24	$30,873.84
592	$52.24	$30,926.08
593	$52.24	$30,978.32
594	$52.24	$31,030.56
595	$52.24	$31,082.80
596	$52.24	$31,135.04
597	$52.24	$31,187.28
598	$52.24	$31,239.52
599	$52.24	$31,291.76

Appendix B

Storm Water Pollution Prevention Plans

STORM WATER POLLUTION PREVENTION PLAN
LPDES PERMIT NO. LA0036439

CITY OF BATON ROUGE
NORTH WASTEWATER TREATMENT PLANT
50 WOODPECKER STREET
BATON ROUGE, LOUISIANA
EAST BATON ROUGE PARISH

LDEQ AGENCY INTEREST NO. 4843

PPM PROJECT NO. 55098004

UPDATED SEPTEMBER 2020

STORM WATER POLLUTION PREVENTION PLAN
LPDES PERMIT NO. LA0036439

FOR

CITY OF BATON ROUGE
NORTH WASTEWATER TREATMENT PLANT
50 WOODPECKER STREET
BATON ROUGE, LOUISIANA 70807
EAST BATON ROUGE PARISH

LDEQ AGENCY INTEREST NO. 4843

PREPARED FOR:

CITY OF BATON ROUGE
NORTH WASTEWATER TREATMENT PLANT
50 WOODPECKER STREET
BATON ROUGE, LOUISIANA 70807
(225) 389-5582

PPM PROJECT NO. 55098004

SEPTEMBER 2020

PREPARED BY:

PPM CONSULTANTS, INC.
7936 OFFICE PARK BOULEVARD, SUITE A
BATON ROUGE, LOUISIANA 70809
(225) 293-7270

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1.0 INTRODUCTION

1.1 PURPOSE AND SCOPE

This document is intended to serve as the Storm Water Pollution Prevention Plan (SWP3) for City of Baton Rouge North Wastewater Treatment Plant (North WWTP) located at 50 Woodpecker Street in Baton Rouge, Louisiana. The purpose of the SWP3 is to document the management practices and storm water pollution prevention measures that are in place or will be implemented at the facility in order to prevent or minimize the contamination of storm water discharges by potential pollutant sources at the site. This plan has been prepared pursuant to the requirements and provisions of the U. S. Environmental Protection Agency (USEPA) document 832-R-92-006 (Stormwater Management for Industrial Activities: Developing Pollution Prevention Plans and Best Management Practices).

This pollution prevention plan has been prepared in accordance with good engineering practices to provide for compliance with Louisiana Pollutant Discharge Elimination System (LPDES) Permit No. LA0036439. It identifies potential sources of pollution which may reasonably be expected to affect the quality of storm water associated with industrial activity discharge at the outfalls covered by the permit. The plan also describes practices that minimize pollutants in this storm water discharge.

1.2 REGULATORY BACKGROUND

The facility operates as a sewage treatment plant with designated Standard Industrial Classification (SIC) Code No. 221320. The facility currently discharges storm water runoff under the LPDES Permit No. LA0036439, effective date Sept. 1, 2018. A copy of the current permit is included as **Appendix A, LPDES Permit No. LA0036439**. Part II, Requirement K, of the permit requires the permittee to prepare, implement, and maintain a SWP3. The terms and conditions of the SWP3 become an enforceable part of the final permit. The current water permit expires on . September 1, 2023.

1.3 SITE LOCATION AND PROPERTY DESCRIPTION

The facility is located in East Baton Rouge Parish, Louisiana, in Section 74, Township 6 South, Range 1 West of the Scotlandville, Louisiana United States Geological Survey (USGS) topographic map. The facility is located at approximately Longitude 91.202813° and Latitude 30.5342158°. The site location is shown in **Figure 1, Site Location Map**.

The facility is located at 50 Woodpecker Street in Baton Rouge, Louisiana. The facility's topography is relatively flat with an elevation of approximately 55 feet (above sea level) and a slight slope to the west according to the National Geodetic Vertical Datum (NGVD).

1.4 DESCRIPTION OF FACILITY OPERATIONS

The facility provides preliminary treatment including screening and grit removal, primary clarification, and secondary treatment using bio-filtration (trickling filters) followed by secondary clarification and chlorination. The treated wastewater exits the plant via gravity flow to the Mississippi River during low river stages and is pumped during high river stages. Primary sludge is pumped directly into the gravity thickeners then directed into the anaerobic digesters for stabilization and volatile solids reduction. Digested sludge is de-watered by belt filter presses. Liquids from the dewatering process and half of secondary sludge is directed back to the plant headworks. The other half of the secondary sludge is directed to the gravity thickeners. The dewatered sludge cake is trucked to the North Landfill Facility for disposal. The grit, screenings, and other removed floatable objects are collected in containers for disposal at the North Landfill Facility.

Also located at the facility is an administration building and a maintenance shop. Additional on-site activities not directly associated with the wastewater treatment processes include: maintenance and/or repair of equipment, vehicles, buildings, and grounds. All activities described here are conducted in covered areas which do not allow any contact with storm water runoff.

The land use within the facility consists of buildings, pavement, open tanks, drainage, ditches, and grassy or vacant areas. In general, the only areas that will not allow storm water runoff are the open process tanks since precipitation falling on these areas will become part of the wastewater process. The open process tanks cover approximately 15 percent of the property, while the remaining 85 percent of the facility is covered by pervious areas such as ditches, grassy areas and impervious areas such as buildings, pavement and closed tanks. A plot plan is included as **Figure 2, Site Map**.

2.0 STORM WATER POLLUTION PREVENTION TEAM

2.1 TEAM ROSTER AND INDIVIDUAL RESPONSIBILITIES

The following staff has been identified by the North WWTP to comprise the facility's SWP3 team. The members of the SWP3 team are delegated specific storm water management tasks for the development, implementation, and revision of the SWP3. The members consist of North WWTP personnel and management. The following tasks have been assigned:

The Wastewater Treatment Plant Manager, C. Van Veckhoven will serve as the leader/response coordinator of the SWP3 Team. He will have all signatory authority on all certifications for the SWP3 and will be responsible for development and implementation of the SWP3. He will be the team contact in the event of an accidental spill, leak, discharge, or release. The Wastewater Treatment Plant Supervisor will appropriately delegate and oversee the annual employee training. Specific duties include:

- Supervising Plan Development
- Ensuring Employee Training
- Selecting Best Management Practices (BMPs)
- Ensuring the Implementation of the SWP3

The 'Treatment Plant Operators and Plant Management will perform the sampling, inspections, and the annual comprehensive site compliance evaluations. Specific duties include:

- Communicating Non-Compliance and Implementing Corrective Measures
- Responding to Spills
- Performing Inspections and Annual Evaluations
- Revising the SWP3

The **Wastewater** Treatment Plant Mgr will be responsible for keeping all records and ensuring that all reports are submitted to the proper authority.

The **SWP3 Team** is responsible for oversight to ensure that all requirements and conditions of the SWP3 and the LPDES permit are implemented.

3.0 DESCRIPTION OF FACILITY AND POTENTIAL POLLUTANT SOURCES

3.1 DESCRIPTION OF FACILITY SITE AND RECEIVING WATERS

The facility processes storm water through one permitted outfall, Outfall 001. The facility has four non-permitted storm water outfalls, Storm Water Outfall No. 1, No. 2, No. 3, and No. 5. In addition, approximately 15 percent of the plant's surface area consists of open tanks. Precipitation falling in these areas becomes a part of the wastewater stream. A description of each outfall and sources of discharge water for the outfall is presented below.

Outfall 001

This outfall discharges treated sanitary wastewater at a design capacity of 54 million gallons per day (MGD). The outfall located at the point of discharge from the last treatment unit prior to mixing with other waters. The treated wastewater exits the plant via gravity flow to the Mississippi River during low river stages and is pumped during high river stages.

Storm Water Outfalls 1, 2, 3, and 5

These non-contact outfalls discharge only storm water. Storm drains inside the North WWTP are discharged off site and eventually comingle with waters of the Mississippi River.

3.2 SUMMARY OF POTENTIAL POLLUTANT SOURCES

As part of the assessment phase of the SWP3, the storm water runoff drainage areas described in **Section 3.1** were inspected to identify any exposed significant materials within the drainage areas, which have the potential to contribute pollutants to the storm water runoff. As defined in LAC 33:IX.2341.B.12, the term "significant materials" includes, but is not limited to: raw materials, fuels, solvents, finished products, hazardous substances, any chemical the facility is required to report pursuant to Section 313 of Title III of Superfund Amendments and Reauthorization Act (SARA), and any waste products that have the potential to be released with storm water runoff.

An inventory of exposed significant materials and potential pollutant source(s) are identified and listed below, as well as the specific pollutant parameter(s) of concern (where applicable) that can reasonably be associated with each source, and existing materials management practices and structural controls designed to prevent or minimize storm water contamination.

- Used oil may be a potential source of pollutants. However the 350-gallon tote is stored on pallet containment, and the 55-gallon drums of used oil are stored inside the used oil storage building and are equipped with secondary containment. Therefore, no potential impact to the storm water occurs.
- Potential sources of pollutants may occur in the loading/unloading areas. Measures are taken to prevent the spill or release of biosolids by providing a washdown area for sludge trailers and equipment. The liquid from this washdown area flows to the headworks of the plant where it enters the incoming wastewater stream.
- There are several trash dumpsters, located outdoors, which may be a potential source of pollutants. However, only non-hazardous waste is disposed of in the dumpsters and the tops remain closed eliminating potential impact to the storm water.

Discharge scenarios for each pollutant source including the maximum volume and rate of the potential discharge and direction of flow are provided in the table below.

TABLE 3-1
POTENTIAL DISCHARGE VOLUMES AND DIRECTION OF FLOW

Potential Event	Maximum Volume Released (gallons)	Maximum Discharge Rate	Direction of Flow	Secondary Containment
350-Gallon Used Oil Tote				
Leak or failure of tote	350	Gradual to instantaneous	Does not leave building. Floors slope away from doors and walls.	Pallet storage, sorbent material, building structure, active containment
55-Gallon Used Oil Drums				
Leak or failure of drum	55	Gradual to instantaneous	Does not leave building. Floors slope away from doors and walls.	Sorbent material, building structure, active containment

3.3 HAZARDOUS SUBSTANCES AND OIL

The Facility, as a general practice, prevents or minimizes the discharge of hazardous substances or oil in their wastewater/storm water discharges in accordance with the BMPs described in **Section 4.0, Storm Water Pollution Prevention Best Management Practices and Controls**. Hazardous substances that are present at the site include fertilizers, pesticides, solvents, equipment fuel, anti-freeze, and used oil.

3.4 SIGNIFICANT SPILLS AND LEAKS

There have been no significant spills or leaks at the facility.

A significant spill is defined by USEPA as releases that occur within a 24-hour period of hazardous substances in excess of reportable quantities under Section 311 of the Clean Water Act (CWA) and Section 302 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Reportable quantities can be found listed in USEPA 40 Code of Federal Regulations (CFR) Parts 117 and 302.

Should a release occur, as described in this section, the facility will modify the SWP3 within 14 calendar days of knowledge of the release to:

- Provide a description of the release
- Describe the circumstances leading to the release
- Record the date of the release
- Review the SWP3 to identify measures to prevent recurrence of such releases
- Modify the SWP3 where appropriate

The North WWTP will report non-compliance, which may impact health or the environment. As required by LAC 33.I.3195, in the event of an unauthorized discharge that does cause an emergency condition, the North WWTP will notify the Louisiana Department of Public Safety (DPS) 24-hour Louisiana Emergency Hazardous Materials hotline by telephone 225-925-6595 immediately, but in no case later than one hour after learning of the discharge. An emergency condition is any condition that could reasonably be expected to endanger or impact the health or safety of the public, cause significant adverse impact to the land, water, or air, or cause severe damage to property. Notification required by this section must be made regardless of the amount of discharge. Written

notification will be provided within five (5) days of the time that the North WWTP becomes aware of the circumstances. The written report will contain the following information:

- A description of the non-compliance and its cause
- The period of non-compliance, including exact dates and times, and if the non-compliance has not been corrected, the anticipated time it is expected to continue
- Steps taken to reduce, eliminate, and prevent recurrence of the non-complying discharge

As required by LAC 33:I.3917, in the event of an unauthorized discharge that exceeds a reportable quantity but does not cause an emergency condition, the North WWTP will notify the Louisiana Department of Environmental Quality (LDEQ), Office of Environmental Compliance by one of the following methods (listed in order of preference):

1) Online reporting via the LDEQ website at http://www.deq.state.la.us/surveillance/irf/forms/
2) Direct e-mail at spillcomplaint@ldeq.sla.us (there is no confirmation of receipt when using this means of notification)
3) Telephone at 225-219-3640 or 225-342-1234 (24-Hour Hotline) within 24 hours of learning of the discharge

Verbal notification must include the following items:

- Name of the person making the notification and telephone number where any return calls from LDEQ/DPS can be placed
- Name and location of the facility where the unauthorized discharge is imminent or has occurred using common landmarks; in the event of an incident involving transportation, including the name and address of transporter and generator
- Date and time the incident began and ended, or estimated time of continuation, if discharge is continuing
- Extent of any injuries and identification of any known personnel hazards which response agencies may face

- Common or scientific chemical name, US Department of Transportation hazard classification, and best estimate of amount of discharge materials
- Brief description of the incident sufficient to allow response agencies to formulate the level and extent of response activity needed

Within seven (7) calendar days of verbal notification to the DPS or the LDEQ, the North WWTP will provide a written report with the following information:

- Name of person, company, or other party filing the written report.
- Time and date of verbal notification, name of person making the notification, and identification of the site or facility, or transport vehicle, from which the unauthorized discharge occurred.
- Date(s), time(s), and duration of the unauthorized discharge and, if not corrected, the anticipated time it is expected to continue.
- Details of the circumstances and events leading to any emergency condition, including incidents of loss of sources of radiation.
- Common or scientific chemical name, the Chemical Abstracts Service (CAS) number, US Department of Transportation hazard classification, and best estimate of the amount of any or all discharged pollutants, including methodology for calculations and estimates.
- Statement of actual or probable fate or disposition of the pollutant or source of radiation.
- Remedial actions taken, or to be taken, to stop unauthorized discharges or to recover materials or sources of radiation.
- Procedures or measures which have been or will be adopted to prevent recurrence of the incident or similar incidents, including incidents of loss of sources of radiation.
- Reporting party's status (former or present owner, operator, disposer, etc.).
- Additional information for discharges to the ground or groundwater will also be included. This includes information of which the reporting party is aware that indicates materials are migrating, including, but not limited to, monitoring well data; possible routes of migrations; information of which the reporting party is aware regarding public or private wells in the area of the migration used for drinking, stock watering, or irrigation.

- Names of other responsible parties of which the reporting party is aware.
- Determination by the discharger of whether or not the discharge was preventable; if not, an explanation of why the discharge was not preventable.

If a particular substance is not listed in LAC 33:I.3931, that substance is not subject to a Spill Prevention and Control (SPC) Plan. However, it does not absolve the discharger from reporting its release, as stated in LAC 33:I.3927.A:

"This list (LAC 33:I.3931) is intended as a guide for the regulated community to reportable quantities of some of the more common pollutants. Exclusion of a substance from this list does not relieve the discharger from the reporting requirements of this regulation or from those of other department regulations. Each discharge must be evaluated individually and reported appropriately by the discharger."

Accordingly, if the release of any substance could result in an emergency condition, it must be reported immediately.

3.5 NON-STORM WATER DISCHARGES

A non-storm water discharge includes any process or domestic wastewater. Connection of a non-storm water discharge to the storm water collection or outfall requires an LPDES permit since the discharge may pose a significant deterioration of water quality. The North WWTP is permitted under LPDES Permit No. LA0036439 to discharge treated sanitary wastewater by pipe into the Mississippi River. Non-permitted Storm Water Outfall No. 1, No. 2, No. 3, and No. 5 discharge only non-process area storm water.

An assessment of any potentially unidentified non-storm water discharges at the facility is included **Appendix B, Non-Storm Water Discharge Assessment and Certification**. This assessment must be conducted during a period of dry weather (no rain for at least the previous three days). A visual assessment of each storm water outfall will identify any locations with flowing or stagnant water or discharging liquid; the presence of such liquid is indicative of a non-storm water discharge. Identify the source of the liquid and determine if it is one of the USEPA-approved non-storm water discharges.

Specific non-storm water discharges have been approved by the USEPA and include the following:

- Discharges from firefighting activities and fire hydrant flushings.
- Potable water sources including water line flushings.
- Uncontaminated air conditioning or compressor condensate.
- Irrigation drainage.
- Landscape watering provided all pesticides, herbicides, and fertilizer have been applied in accordance with manufacturer's instructions.
- Water from the routine washing of pavement, conducted without the use of detergents and where spills or leaks of toxic or hazardous materials have not occurred (unless all spilled material has been removed).
- Water from the routine external washing of buildings, conducted without the use of detergents.
- Springs and other non-contaminated groundwater.
- Water from foundation or footing drains where flows are not contaminated with process materials such as solvents.

The City of Baton Rouge North WWTP certifies that, by signing this Plan, the non-permitted storm water outfall flow has been observed and evaluated for the presence of non-storm water discharges and that any non-storm water discharges not covered by the facility's existing permit are either to be eliminated or planned to be permitted.

3.6 RISK IDENTIFICATION AND SUMMARY OF POTENTIAL POLLUTANT SOURCES

Based on the information obtained during the field investigation and site assessment phase, the following were identified as potential pollutant sources at the facility that pose a risk of contaminating storm water discharges to the Mississippi River.

The information contained in **Section 3.2** of this SWP3 documents the North WWTP's assessment of the potential pollutants and pollutant sources within each storm water drainage area of the facility.

4.0 STORM WATER POLLUTION PREVENTION BEST MANAGEMENT PRACTICES AND CONTROLS

The focus of the following sections of the SWP3 will be to document the BMPs and other storm water management practices and controls identified to be implemented at the facility in order to minimize and/or prevent the discharge of potential pollutants in storm water runoff from the facility. BMPs are measures implemented to prevent or mitigate pollution from any type of activity. Based upon the potential pollutant sources and storm water/non-storm water discharges identified in **Sections 3.1 through 3.4**, North WWTP has selected the following BMPs for implementation at the site and documentation in the SWP3.

4.1 GOOD HOUSEKEEPING

Measures designed to maintain a clean, orderly, and safe work environment also contribute to the prevention of potential pollutant sources from coming into contact with and impacting storm water runoff. Good housekeeping also reduces the potential for accidental spills caused by mishandling of significant materials, thereby enhancing the safety of plant personnel. North WWTP is committed to following good housekeeping measures.

General order and cleanliness will be practiced throughout the facility site. Each employee will be responsible for keeping work areas clean and orderly. All debris and waste materials must be properly disposed of in designated waste receptacles for subsequent disposal. All equipment, parts, dumpsters, trash bins, petroleum products, chemical solvents, detergents, or other materials exposed to storm water will be maintained in a manner which prevents contamination of storm water by pollutants.

In the event of a spill, all spilled product and spilled wastes will be immediately cleaned up and disposed of according to all applicable regulations. The use of detergents, emulsifiers, or dispersants to clean up spilled product is prohibited except where necessary to comply with state or federal safety regulations (i.e., requirement for non-slippery work surface). In all such cases, initial cleanup will be done by physical removal and chemical usage will be minimized.

Garbage is disposed of approximately once per week at the North WWTP. A monthly storm water facility inspection is conducted for all solids handling, storage or disposal areas, and access roads to identify potential storm water contamination sources.

Minimize Exposure

Measures are taken to prevent the spill or release of biosolids by providing a washdown area for sludge trailers and equipment. The liquid from this washdown area flows to the headworks of the plant where it enters the incoming wastewater stream. Cleaning solvent and equipment fuels are stored indoors in properly marked containers.

Maintenance

All equipment is maintained according to manufacturer specifications, such procedures are kept in a maintenance log book documenting person(s) performing such, dates, time, parts replaced/repaired, hours on equipment, and any malfunctions or unusual wear noticed on such equipment. The maintenance schedule may be altered to suit the individual equipment being used should the equipment be subjected to longer, harsher, or any other undue stresses/uses that would be considered abnormal. Routine maintenance will prevent and/or detect any malfunctions before they occur. In the event of an unforeseen malfunction or breakdown, the equipment will be repaired immediately by qualified personnel, either in-house, or by an outside vendor before such equipment is placed back in service.

LPDES Non-Numeric Effluent Limits

In addition to the visual assessments and numerical limits for Biological Oxygen Demand (BOD), Total Suspended Solids (TSS), and Fecal Coliform, no non-numeric effluent limits are required as outlined in the 2013 LPDES. However, the 2013 LPDES's requirements include the prohibition of non-storm water discharges, the implementation of control measures and employee training.

Waste, Garbage, and Floatable Debris

Waste, garbage, and floatable debris discharges are minimized through the use of good housekeeping practices and a regular refuse disposal schedule. Garbage at the North WWTP is loaded into dumpsters prior to final disposal at the North Landfill in Zachary, Louisiana. Digested sludge is removed from the North WWTP daily via sludge trailers prior to disposal at the North Landfill. In addition, floatable debris from the primary and secondary clarifiers is disposed of with the use of vacuum trucks.

Dust Generation and Vehicle Tracking of Industrial Materials

Sludge trailers are washed clean after loading so that excess sludge may be collected and transported to the plant headworks to become part of the influent wastewater stream.

4.2 SPILL PREVENTION AND RESPONSE PROCEDURES

It is North WWTP's policy that all spills/releases of significant materials with potential to impact storm water runoff from the site will be properly responded to in accordance with proper spill prevention and response measures and applicable regulations. Any materials spilled/released will be properly contained, recovered, and properly disposed off site, as applicable, so as to prevent contamination of storm water. All significant spill incidents requiring notification to regulatory agencies must be reported in accordance with state and federal regulations.

4.3 PREVENTIVE MAINTENANCE (PM)

North WWTP has selected several BMPs that anticipate and seek to prevent potential exposures of pollutants to storm water runoff through preventive inspection and maintenance of all equipment and storm water management controls.

4.4 INSPECTIONS AND RECORDS

The outfalls are checked daily for the presence of sheen, deposits, or stains. Formal inspections are done quarterly and documented on the checklist attached in **Appendix C, Facility Inspection Forms**.

A formal site inspection is conducted annually by one or more members of the SWP3 team as part of the required comprehensive site evaluation. All areas of the facility identified in **Section 3.2** of this plan, as well as all existing BMPs, are evaluated and inspected. Results of these inspections will be retained with the SWP3 for a period of at least three years from the date that the permit expires. The formal site inspection form is provided in **Appendix D, Annual Comprehensive Site Compliance Evaluation Report**.

4.5 EMPLOYEE TRAINING AND COMMUNICATION

Employee training will be conducted annually. This training will address such topics as spill prevention and response, good housekeeping, and material management practices, and

operations and maintenance review. Periodic reviews to explain new techniques or improved procedures are conducted as necessary. Pollution prevention training will be documented as to the date training occurred, employees present, and topics covered (see **Appendix E, Employee Training Records**).

4.6 SEDIMENT AND EROSION CONTROL

Measures will be taken to the greatest extent possible to control the amount of sediment entering and leaving the North WWTP grounds during rainfall and other storm water related events. This will be accomplished by the proper grading of sloped areas, and vegetated buffer zones as site specific conditions warrant. Erosion control will naturally be enhanced using these procedures and by the monitoring of sensitive areas. The overall and most comprehensive erosion control structures at the North WWTP are vegetated buffer zones. Other control measures such as diversion structures and silt fences shall be considered as temporary control measures used during construction, maintenance, and repair operations.

4.7 MANAGEMENT OF STORM WATER RUNOFF

The North WWTP was designed to divert, to the greatest extent possible, storm water entering the plant. Most of the precipitation entering the plant is collected in a system of storm drains then subsequently discharged into the Mississippi River. Non-process storm water outfalls are labeled on **Figure 2, Site Map**. In addition, approximately 15 percent of the plant's surface area consists of open tanks. Precipitation falling in these areas becomes a part of the wastewater stream, and discharged through Outfall 001.

4.8 FACILITY SECURITY

To prevent unauthorized entry and vandalism as well as protect against unintentional spills from storage areas and loading/unloading areas, a chain-linked fence with a locked gate surrounds the operations area of the facility.

5.0 STORM WATER POLLUTION PREVENTION PLAN EVALUATION AND MONITORING REQUIREMENTS

5.1 PURPOSE AND SCOPE

The North WWTP will document actions as required by this SWP3. The SWP3 team will assume all responsibility to see that documentation forms are properly completed and kept for the duration of three years. The team will conduct a comprehensive site compliance evaluation to ensure the effectiveness and accuracy of the BMPs and site information contained herein. Revisions to this plan and subsequent implementations will also be documented and directed by the team.

5.2 RECORD MAINTENANCE AND PUBLIC ACCESS

Safety data sheets will be on file for all current inventory of bulk chemicals handled at the facility. Inspections and maintenance activities regarding storm water pollution prevention measures and controls will be documented, and records of such activities will be retained on site.

This SWP3 and all related documentation will be made available to all regulatory agencies upon request. The general public may review the plan and all related documentation by submitting a request through the Director of USEPA, Region VI or the Assistant Secretary of the LDEQ, Office of Environmental Services.

5.3 STORM WATER SAMPLING AND ANALYSIS

In accordance with the storm water monitoring requirements contained in LPDES Permit No. LA0036439, the North WWTP is required to conduct monthly, quarterly, semiannual, and annual monitoring of the permitted outfalls. Quantitative analytical data must be collected and submitted by the 15th day of the month following the sampling period. Included in the table below are the parameters and limitations for each pollutant at every permitted outfall.

TABLE 5-1
DAILY SAMPLING OUTFALLS, PARAMETERS, AND LIMITATIONS

Outfall	Parameter	Limitation
Outfall 001	Flow	N/A
	pH	6 - 9 s.u.
	Biological Oxygen Demand (BOD)	Monthly Average: 15,511 lb/day, 30 mg/L Weekly Average: 45 mg/L
	Total Suspended Solids (TSS)	Monthly Average: 13,511 lb/day, 30 mg/L Weekly Average: 45 mg/L
	Fecal Coliform (colonies/100mL)	Monthly Average: 200 Weekly Average: 400

TABLE 5-2
QUARTERLY SAMPLING OUTFALLS, PARAMETERS, AND LIMITATIONS

Outfall	Parameter	Limitation
Outfall 001	Biotoxicity Testing	N/A

TABLE 5-3
SEMIANNUAL SAMPLING OUTFALLS, PARAMETERS, AND LIMITATIONS

Outfall	Parameter	Limitation
Outfall 001	Toxic Substances	N/A

All sampling and analytical data required will be retained on site for at least three years beyond the date the records were generated. A summary of LPDES sampling requirements is included in **Appendix A, LPDES Permit No. LA0036439**.

5.4 ANNUAL COMPREHENSIVE SITE COMPLIANCE EVALUATION REPORT

One or more members of the SWP3 team must conduct a thorough site compliance evaluation once each calendar year to evaluate this SWP3 and verify full compliance with LPDES Permit No. LA0036439. A more stringent schedule will be implemented if necessary to achieve compliance. Reports should be retained in this SWP3 in **Appendix D, Annual Comprehensive Site Compliance Evaluation Report**, for at least three years from the date of origin.

Part I of the Annual Comprehensive Site Compliance Evaluation Form

Part I of the Annual Comprehensive Site Compliance Evaluation Form (see **Appendix D**) shall be used to document observations, inspections, review, and verification of measures/controls implemented to reduce/prevent pollution of storm water runoff from the Facility. The evaluation will consist of the following:

- Inspection of the loading/unloading areas and storage areas described in **Section 3.2** of this document for evidence of, or potential for, pollutants entering the drainage system;
- Inspection of exposed significant materials described in **Section 3.2** of this document for evidence of, or potential for, pollutants being released;
- Inspection/observation of storm water management measures and structures and structural pollution prevention BMPs described in **Sections 4.1 through 4.8** of this document to ensure they are adequate, implemented in accordance with the permit, operational, and effective;
- Inspection/observation of sediment controls and erosion controls described in **Section 4.6** of this document to ensure they are adequate, implemented in accordance with the permit, operational, and effective;
- A review of storm water management practices described in **Sections 3.2 and 4.1 through 4.8** of this document; and
- A review of employee training and communication described in **Section 4.5** of this document.

Part II of the Annual Comprehensive Site Compliance Evaluation Form

Based on Part I of the Annual Comprehensive Site Compliance Evaluation Form, an evaluation of the effectiveness of controls, measures, and management practices will be made to determine whether modified, additional, or different controls, measures, or management practices are needed. This will be documented in Part III of the Annual Comprehensive Site Compliance Evaluation Form (**Appendix D**).

Part III of the Annual Comprehensive Site Compliance Evaluation Form

Upon completion of Parts I and II of each Annual Comprehensive Site Compliance Evaluation Form, a report must be prepared that summarizes the following (the report is

Part III of the Annual Comprehensive Site Compliance Evaluation Form – see **Appendix D**):

- Scope of the inspection/evaluation;
- Personnel conducting and date(s) of the inspection/evaluation;
- Major observations relating to implementation of the SWP3;
- Actions taken or to be taken to revise the SWP3 and to implement the associated changes;
- List of incidents of non-compliance;
- Documentation of provisions to ensure the summary report will be retained as part of the facility SWP3, and will be retained for at least three years after the report was generated;
- If incidents of non-compliance are not found, certification that the facility is in compliance with the SWP3 Plan and their LPDES permit, and certification of the verity of the comprehensive site compliance evaluation and summary report; and
- If incidents of non-compliance are found, certification of (1) the verity of the document, and (2) if necessary, intent to revise the SWP3 and/or implement any corrective actions in a timely manner.

5.5 SWP3 REVISION AND SUBSEQUENT IMPLEMENTATION

As a result of each comprehensive site compliance evaluation for which incidents or situations of non-compliance are determined, the following revisions must be included in the SWP3 as needed:

- The description in the plan of additional or new potential pollution sources not previously addressed and pollution prevention measures and controls necessary must be revised within 30 days after the completion of the comprehensive site evaluation.
- Changes in procedural operations must be implemented at the site in a timely manner for nonstructural measures and controls and not to exceed more than 12 weeks after completion of the comprehensive site evaluation.
- Pollution prevention measures that require construction of structural controls are allowed up to three years to implement.

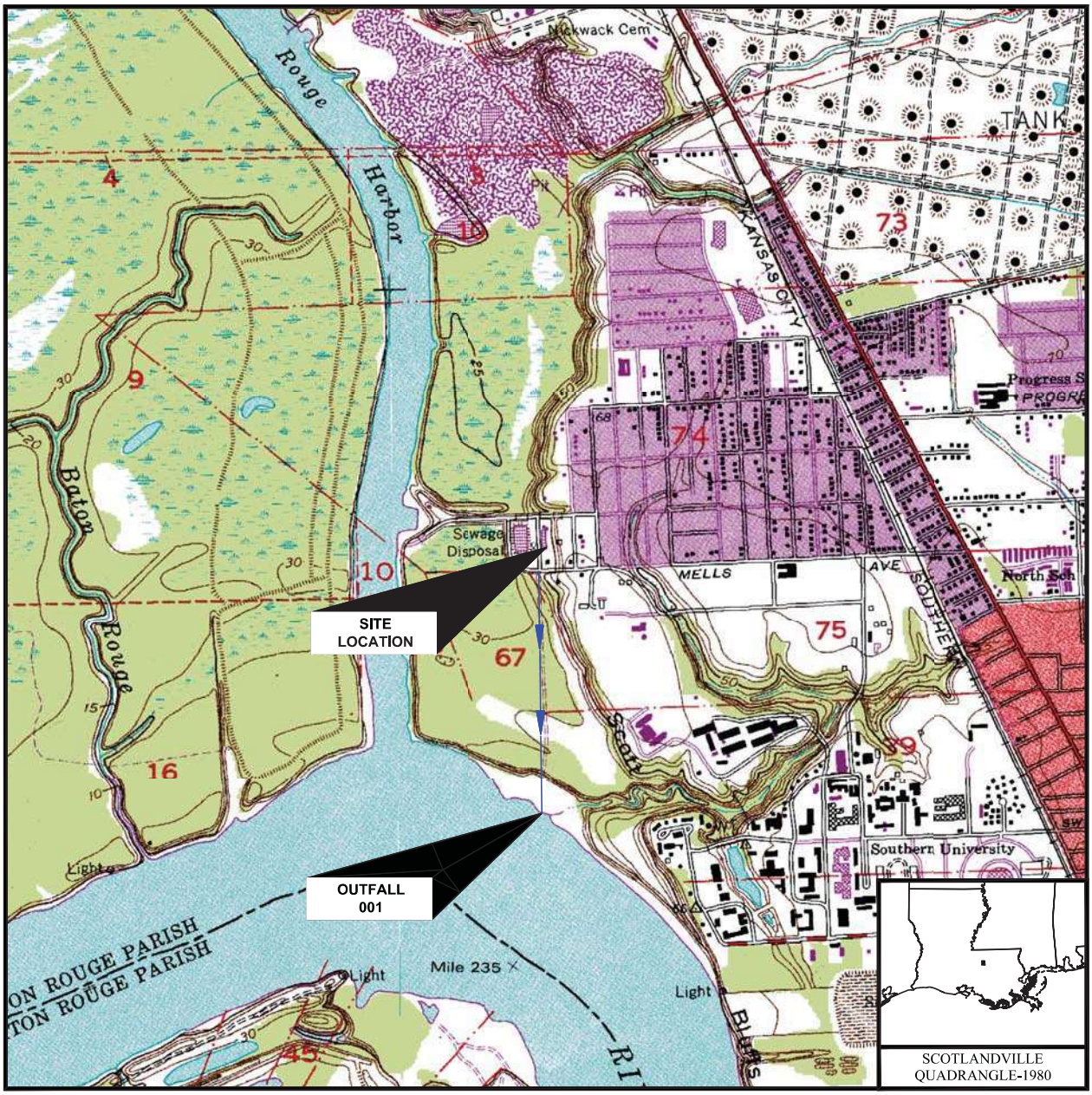
Documentation of revisions to the SWP3 should be retained in **Appendix F, Revisions to the Storm Water Pollution Prevention Plan**.

5.6 CERTIFICATION AND SIGNATORY AUTHORITY

North WWTP has initially certified that the SWP3 is accurate and complete to the best of their knowledge. The SWP3 certification is located in **Appendix G, Storm Water Pollution Prevention Plan Certification**.

Signature requirements apply to the initial certification of the SWP3 (**Appendix G**), the initial certification on non-storm water discharges (**Appendix B**), and for each Annual Comprehensive Site Compliance Evaluation (**Appendix D**). All certifications must be made with the signature of (1) a responsible corporate officer (*i.e*. president, vice president, secretary, treasurer, etc.), (2) a manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales exceeding $25 million if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures (as defined in Part III, Section D.10 of the LPDES Permit No. LA0036439), or (3) by a duly authorized representative of that person. Such authorization requires a written submittal to the LDEQ (see Part III, Section D.10.b of the LPDES Permit in **Appendix A**).

FIGURES



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PROJECT NUMBER: 55098004	BILLING GROUP: SPCC

CITY OF BATON ROUGE AND
EAST BATON ROUGE PARISH
NORTH WASTEWATER TREATMENT PLANT
50 WOODPECKER STREET
BATON ROUGE, LOUISIANA

SITE LOCATION MAP

FIGURE NUMBER
1

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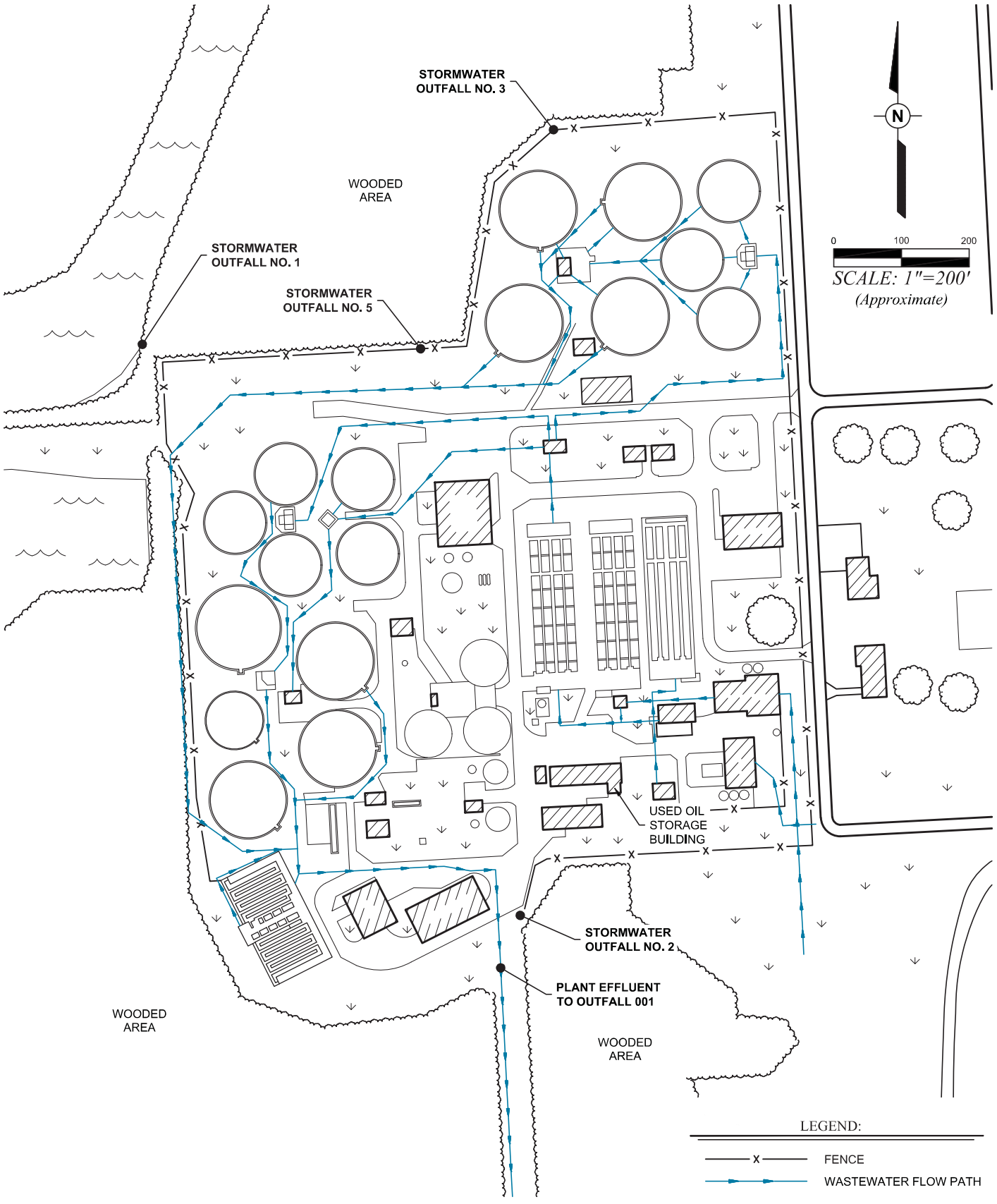

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BWH	04/18/16
PROJECT NUMBER:	BILLING GROUP:
55098004	SPCC

CITY OF BATON ROUGE AND EAST BATON ROUGE PARISH
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50 WOODPECKER STREET
BATON ROUGE, LOUISIANA

SITE MAP

FIGURE NUMBER
2

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STORM WATER POLLUTION PREVENTION PLAN
LPDES PERMIT NO. LA0036412

CITY OF BATON ROUGE
SOUTH WASTEWATER TREATMENT PLANT
2850 GARDERE LANE
BATON ROUGE, LOUISIANA
EAST BATON ROUGE PARISH

LDEQ AGENCY INTEREST NO. 4841

PPM PROJECT NO. 55098004

UPDATED JUNE 2020

STORM WATER POLLUTION PREVENTION PLAN
LPDES PERMIT NO. LA0036412

FOR

CITY OF BATON ROUGE
SOUTH WASTEWATER TREATMENT PLANT
2850 GARDERE LANE
BATON ROUGE, LOUISIANA 70808
EAST BATON ROUGE PARISH

LDEQ AGENCY INTEREST NO. 4841

PREPARED FOR:

CITY OF BATON ROUGE
SOUTH WASTEWATER TREATMENT PLANT
2850 GARDERE LANE
BATON ROUGE, LOUISIANA 70808
(225) 389-5582

PPM PROJECT NO. 55098004

JUNE 2020

PREPARED BY:

PPM CONSULTANTS, INC.
7936 OFFICE PARK BOULEVARD, SUITE A
BATON ROUGE, LOUISIANA 70809
(225) 293-7270

***UPDATED BY :**
JUSTIN SHARPER, P.E.
ENVIRONMENTAL SERVICES

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Appendix G Storm Water Pollution Prevention Plan Certification

1.0 INTRODUCTION

1.1 PURPOSE AND SCOPE

This document is intended to serve as the Storm Water Pollution Prevention Plan (SWP3) for City of Baton Rouge South Wastewater Treatment Plant (South WWTP) located at 2850 Gardere Lane in Baton Rouge, Louisiana. The purpose of the SWP3 is to document the management practices and storm water pollution prevention measures that are in place or will be implemented at the facility in order to prevent or minimize the contamination of storm water discharges by potential pollutant sources at the site. This plan has been prepared pursuant to the requirements and provisions of the U. S. Environmental Protection Agency (USEPA) document 832-R-92-006 (Storm water Management for Industrial Activities: Developing Pollution Prevention Plans and Best Management Practices).

This pollution prevention plan has been prepared in accordance with good engineering practices to provide for compliance with Louisiana Pollutant Discharge Elimination System (LPDES) Permit No. LA0036412. It identifies potential sources of pollution which may reasonably be expected to affect the quality of storm water associated with industrial activity discharge at the outfalls covered by the permit. The plan also describes practices that minimize pollutants in this storm water discharge.

1.2 REGULATORY BACKGROUND

The facility operates as a sewage treatment plant with designated Standard Industrial Classification (SIC) Code No. 221320. The facility currently discharges storm water runoff under the LPDES Permit No. LA0036412, effective date March 1, 2013. A copy of the current permit is included as **Appendix A, LPDES Permit No. LA0036412**. Part II, Section B, of the permit requires the permittee to prepare, implement, and maintain a SWP3. The terms and conditions of the SWP3 become an enforceable part of the final permit. The current water permit expires on September 1, 2023.

1.3 SITE LOCATION AND PROPERTY DESCRIPTION

The facility is located at 2850 Gardere Lane, Baton Rouge, East Baton Rouge Parish, Louisiana, in Section 41, Township 8 South, Range 1 West of the Plaquemine, Louisiana United States Geological Survey (USGS) topographic map at approximately Longitude 91.1359439° and Latitude 30.3487276°. The site location is shown in **Figure 1, Site**

Location Map . The facility's topography is rela tively flat with an elevation of approximately 25 feet (above sea level) and a slight slope to the east according to the National Geodetic Vertical Datum (NGVD).

1.4 DESCRIPTION OF FACILITY OPERATIONS

The facility provides preliminary treatment of sanitary sewage including screening and grit removal, prim ary clarif ication, and secondary treatm ent using bio -filtration (tricklin g filters) followed by secondary clarification a nd chlorination. The treated wastewater exits the plant via the final effluent pump to the Mississippi River. Prim ary sludge is pum ped directly into anaerob ic digesters f or stab ilization and volatile solids reduction. Digested sludge is de-watered by belt filter presse s. Liquids from the dewatering process and secondary sludge is directed b ack to the plant h eadworks. T he dewatered sludge cake is trucked to the North Landfill Facility for disposal. The grit, sc reenings, and other removed floatable objects are collected in containers for disposal at the North Landfill Facility.

Also located at the facil ity is an adm inistration bui lding and a m aintenance shop. Additional on-site activities not directly as sociated with the wastewater treatm ent processes include: m aintenance and/or repair of tanks, equipm ent, vehicles, buildings, and grounds. All activities described here are covered areas w hich do not allow any type of contact storm water discharges to leave the facility.

The land us e within the f acility co nsists of buildings, pavem ent, open tanks, drainage, ditches, and grassy or v acant areas. In genera l, the only areas that will not allow s torm water runoff are the open process tanks sinc e precipita tion f alling on these are as will become part of the wastewater process. The open process tanks cover approxim ately 15 percent of the property, while the rem aining 85 percent o f the f acility is covere d by pervious areas such as ditch es, grassy ar eas and im pervious areas such as buildings, pavement and closed tanks. A plot plan is included as **Figure 2, Site Map**.

2.0 STORM WATER POLLUTION PREVENTION TEAM

2.1 TEAM ROSTER AND INDIVIDUAL RESPONSIBILITIES

The following staff has been identified by the South WWTP to comprise the facility's SWP3 team. The members of the SWP3 team are delegated specific storm water management tasks for the development, implementation, and revision of the SWP3. The members consist of South WWTP personnel and management. The following tasks have been assigned:

The **Wastewater Treatment Plant Manager**, **Gregory Lewis**, will serve as the leader/response coordinator of the SWP3 Team. He will have all signatory authority on all certifications for the SWP3 and will be responsible for development and implementation of the SWP3. The Plant Manager will appropriately delegate and oversee the annual employee training. Specific duties include:

- Supervising Plan Development
- Ensuring Employee Training
- Selecting Best Management Practices (BMPs)
- Ensuring the Implementation of the SWP3

The **Wastewater Treatment Plant Supervisor** will be the team contact in the event of an accidental spill, leak, discharge, or release and will implement corrective measures as necessary.

The **Treatment Plant Operator Supervisors** will perform the sampling, inspections and the annual comprehensive site compliance evaluations will be performed by the WTP Manager, Engineering Supervisor, and other delegated staff. Duties include:

- Communicating Non-Compliance and Implementing Corrective Measures
- Responding to Spills
- Performing Inspections and Annual Evaluations
- Revising the SWP3

The **Wastewater** Treatment Plant Manager will be responsible for keeping all records and ensuring that all reports are submitted to the proper authority.

The **SWP3 Team** is responsible for oversight to ensure that all requirements and conditions of the SWP3 and the LPDES permit are implemented.

3.0 DESCRIPTION OF FACILITY AND POTENTIAL POLLUTANT SOURCES

3.1 DESCRIPTION OF FACILITY SITE AND RECEIVING WATERS

The facility processes treated sanitary wastewater through one permitted outfall, Outfall 001. The facility has six non-permitted storm water outfalls, Storm Water Outfall No. 1, No. 2, No. 3, No. 4, No. 5, and No.6. In addition, approximately 15 percent of the plant's surface area consists of open tanks. Precipitation falling in these areas becomes a part of the wastewater stream, which discharge to Outfall 001. A description of each outfall and sources of discharge water for the outfall is presented below.

Outfall 001

This outfall discharges treated sanitary waste water at a design capacity of 58 million gallons per day (MGD). The outfall located at the point of discharge from the last treatment unit prior to mixing with other waters. The treated wastewater exits the plant via the final effluent pump to the Mississippi River.

Storm Water Outfalls 1, 2, 3, 4, 5, and 6 (Non-Permitted)

These non-contact outfalls discharge only storm water. Storm drains inside the South WWTP are discharged to off-site ditches to the west and south of the site, which eventually comingle with Bayou Fountain, then Bayou Manchac.

3.2 SUMMARY OF POTENTIAL POLLUTANT SOURCES

As part of the assessment phase of the SWP3, the storm water runoff drainage areas described in **Section 3.1** were inspected to identify the exposed significant materials within the drainage areas, which have the potential to contribute pollutants to the storm water runoff. As defined in LAC 33:IX.2341.B.12, the term "significant materials" includes, but is not limited to: raw materials, fuels, solvents, finished products, hazardous substances, any chemical the facility is required to report pursuant to Section 313 of Title III of Superfund Amendments and Reauthorization Act (SARA), and any waste products that have the potential to be released with storm water runoff.

An inventory of exposed significant materials and potential pollutant source(s) are identified and listed below, as well as the specific pollutant parameter(s) of concern (where

applicable) that can reasonably be associated with each source, and existing materials management practices and structural controls designed to prevent or minimize storm water contamination.

- Diesel may be a potential source of pollutants. Five 1,000-gallon diesel tanks are located under the five emergency generators. The tanks double-walled as a secondary containment measure. A potential impact to the storm water could occur if the secondary containment is breached.
- Used oil may be a potential source of pollutants. However the 350-gallon totes are stored on pallet containment, and the 55-gallon drums of used oil are stored inside the used oil storage building and are equipped with secondary containment. Therefore, no potential impact to the storm water occurs.
- Ferric chloride and polymer are stored in tanks above ground near the primary clarifiers and the screening/grit removal building and are used in chemically enhanced primary treatment. These tanks are located within concrete secondary containment. A potential impact to the storm water could occur if the secondary containment is breached.
- One 1,300-gallon tank of sodium hydroxide and one 2,000-gallon tank of sodium hypochlorite are stored in Digester / Thickened Sludge Mixing Tank Area. These tanks are located within concrete secondary containment. A potential impact to the storm water could occur if the secondary containment is breached.
- One 7,650-gallon tank and one 13,900-gallon tank, each containing sodium hypochlorite, are located within concrete secondary containment near the Chlorine Contact Basins No. 1 and No. 2, respectively. A potential impact to the storm water could occur if the secondary containment is breached.
- One 15,000-gallon tank of aluminum sulfate is located in the Aluminum Sulfate Storage Area. The tank is currently not in use, but will be utilized at a future date. The tank is located within concrete secondary containment. A potential impact to the storm water could occur if the secondary containment is breached.
- One 1,300-gallon sodium hydroxide tank, one 7,650-gallon sodium hypochlorite tank, and one 400-gallon sulfuric acid tank are located in the Belt Press Area. These tanks are located within concrete secondary containment. A potential impact to the storm water could occur if the secondary containment is breached.

- Potential sources of pollutants may o ccur in the loading/unload ing areas. A potential impact to the storm water coul d occu r if there w ere a spill during the loading/unloading procedure.
- Measures are tak en to prevent the spill or r elease of bi osolids by providing a washdown area for sludge trailers and e quipment. The liquid from this washdown area flows to the headworks of the plant where it enters th e incom ing wastewater stream.
- There are several trash dum psters, locat ed outdoors, which m ay be a potential source of pollutants. However, only non-ha zardous waste is disposed of in the dumpsters and the tops rem ain clo sed el iminating poten tial im pact to the sto rm water.

Discharge scenarios for each pollutant sour ce including the m aximum volume and rate of the potential discharge and direction of flow are provided in the table below.

TABLE 3-1
POTENTIAL DISCHARGE VOLUMES AND DIRECTION OF FLOW

Potential Event	Maximum Volume Released (gallons)	Maximum Discharge Rate	Direction of Flow	Secondary Containment
1,000-Gallon Diesel Tanks				
Leak or failure of tank	1,000	Gradual to instantaneous	South to Storm Drains, Discharge into Bayou Fountain	Double-walled tanks
Bulk Chemical Storage				
Leak or failure of tank	15,000	Gradual to instantaneous	South and West to Storm Drains, Discharge into Bayou Fountain	Concrete secondary containment
350-Gallon Used Oil Tote				
Leak or failure of tote	350	Gradual to instantaneous	North to Storm Drains, Discharge into Bayou Fountain	Pallet storage, sorbent material, building structure, active containment
55-Gallon Used Oil Drums				
Leak or failure of drum	55	Gradual to instantaneous	South to Storm Drains, Discharge into Bayou Fountain	Sorbent material, building structure, active containment

3.3 HAZARDOUS SUBSTANCES AND OIL

The Facility, as a general practice, prevents or minimizes the discharge of hazardous substances or oil in their wastewater/storm water discharges in accordance with the BMPs described in **Section 4.0, Storm Water Pollution Prevention Best Management Practices and Controls**. Hazardous substances that are present at the site include diesel, fertilizers, pesticides, solvents, equipment fuel, anti-freeze, and used oil.

3.4 SIGNIFICANT SPILLS AND LEAKS

There have been no significant spills or leaks at the facility.

A significant spill is defined by USEPA as releases that occur within a 24-hour period of hazardous substances in excess of reportable quantities under Section 311 of the CWA and Section 302 of the Comprehensive Environmental Response, Compensation, and Liability Act. Reportable quantities can be found listed in USEPA 40 Code of Federal Regulations (CFR) Parts 117 and 302.

Should a release occur, as described in this section, the facility will modify the SWP3 within 14 calendar days of knowledge of the release to:

- Provide a description of the release
- Describe the circumstances leading to the release
- Record the date of the release
- Review the SWP3 to identify measures to prevent recurrence of such releases
- Modify the SWP3 where appropriate

The South WWTP will report non-compliance, which may impact health or the environment. As required by LAC 33.I.3195, in the event of an unauthorized discharge that does cause an emergency condition, the South WWTP will notify the Louisiana Department of Public Safety (DPS) 24-hour Louisiana Emergency Hazardous Materials hotline by telephone 225-925-6595 immediately, but in no case later than one hour after learning of the discharge. An emergency condition is any condition that could reasonably be expected to endanger or impact the health or safety of the public, cause significant adverse impact to the land, water, or air, or cause severe damage to property. Notification required by this section must be made regardless of the amount of discharge. Written

notification will be pro vided within f ive (5) days of the tim e that the South WW TP becomes aware of the circum stances. The written rep ort will co ntain the following information:

- A description of the non-compliance and its cause
- The period of non-compliance, including ex act dates and tim es, and if the non-compliance has not been corrected, the anticipated time it is expected to continue
- Steps taken to reduce, elim inate, and prevent recurrence of the non-com plying discharge

As required by LAC 33:I.3917, in the event of an unauthorized discharge that exceeds a reportable q uantity but does not ca use an emergency cond ition, the S outh W WTP will notify the Louisiana Departm ent of Environm ental Quality (LDEQ), Of fice of Environmental Com pliance by one of the following m ethods (listed in order of preference):

1) Online reporting via the LDEQ website at http://www.deq.state.la.us/surveillance/irf/forms/
2) Direct e-m ail at spillcomplaint@ldeq.sla.us (th ere is no confirm ation of receipt when using this means of notification)
3) Telephone at 225-219-3640 or 225-342-1234 (24-Hour Hotline) within 24 hours of learning of the discharge

Verbal notification must include the following items:

- Name of the person making the notification and telephone number where any return calls from LDEQ/DPS can be placed
- Name and location of the facility where the unauthorized discharge is imminent or has occurred using common landm arks; in the event of an incident involving transportation, including the name and address of transporter and generator
- Date and tim e the incident began and e nded, or estim ated tim e of continuation, if discharge is continuing
- Extent of any injuries and identification of any known personnel hazards which response agencies may face

- Common or scientific chem ical nam e, US Departm ent of Transporta tion hazard classification, and best estimate of amount of discharge materials
- Brief description of the inci dent sufficient to allow res ponse agencies to form ulate the level and extent of response activity needed

Within seven (7) calendar days of verbal no tification to th e DPS or the LDEQ, the South WWTP will provide a written report with the following information:

- Name of person, company, or other party filing the written report.
- Time and date of verbal notification, na me of person m aking th e notification, and identification of the site or f acility, or transport vehicle, from which the unauthorized discharge occurred.
- Date(s), time(s), and duration of the una uthorized discharge a nd, if not corrected, the anticipated time it is expected to continue.
- Details of the circum stances and events leading to any em ergency condition, including incidents of loss of sources of radiation.
- Common or scientific chem ical nam e, the Chem ical Abstracts Service (CAS) number, US Departm ent of Transportation hazard classification, and best estim ate of the a mount of any or all discharg ed pollutants, including m ethodology for calculations and estimates.
- Statement of actual or probabl e fate or disposition of th e pollutant or source of radiation.
- Remedial actions taken, or to be taken, to stop unauthorized discharges or to recover materials or sources of radiation.
- Procedures or m easures which have been or will be adop ted to prev ent recurrence of the incident or similar incidents, includ ing incide nts of loss of sources of radiation.
- Reporting party's status (former or present owner, operator, disposer, etc.).
- Additional infor mation for di scharges to the ground or gr oundwater w ill also be included. This includes inform ation of which the reporting party is aware that indicates materials are m igrating, includi ng, but not lim ited to, m onitoring well data; possible routes of m igrations; info rmation of which the reporting party is aware regarding public or private wells in the area of the m igration used for drinking, stock watering, or irrigation.

- Names of other responsible parties of which the reporting party is aware.
- Determination by the discharger of whether or not the discharge was preventable; if not, an explanation of why the discharge was not preventable.

If a particular substance is not listed in LAC 33:I.3931, that substance is not subject to a Spill Prevention and Control (SPC) Plan. However, it does not absolve the discharger from reporting its release, as stated in LAC 33:I.3927.A:

"This list (LAC 33:I.3931) is intended as a guide for the regulated community to reportable quantities of some of the more common pollutants. Exclusion of a substance from this list does not relieve the discharger from the reporting requirements of this regulation or from those of other department regulations. Each discharge must be evaluated individually and reported appropriately by the discharger."

Accordingly, if the release of any substance could result in an emergency condition, it must be reported immediately.

3.5 NON-STORM WATER DISCHARGES

A non-storm water discharge includes any process or domestic wastewater. Connection of a non-storm water discharge to the storm water collection or outfall requires an LPDES permit since the discharge may pose a significant deterioration of water quality. The South WWTP is permitted under LPDES Permit No. LA0036412 to discharge treated sanitary wastewater by pipe into the Mississippi River. Non-permitted Storm Water Outfall No. 1, No. 2, No. 3, No. 4, No. 5, and No. 6 discharge only non-process area storm water.

An assessment of any potentially unidentified non-storm water discharges at the facility is included **Appendix B, Non-Storm Water Discharge Assessment and Certification**. This assessment must be conducted during a period of dry weather (no rain for at least the previous three days). A visual assessment of each storm water outfall will identify any locations with flowing or stagnant water or discharging liquid; the presence of such liquid is indicative of a non-storm water discharge. Identify the source of the liquid and determine if it is one of the USEPA-approved non-storm water discharges.

Specific non-storm water discharges have been approved by the USEPA and include the following:

- Discharges from firefighting activities and fire hydrant flushings.
- Potable water sources including water line flushings.
- Uncontaminated air conditioning or compressor condensate.
- Irrigation drainage.
- Landscape watering provided all pesticides, herbicides, and fertilizer have been applied in accordance with manufacturer's instructions.
- Water from the routine washing of pavement, conducted without the use of detergents and where spills or leaks of toxic or hazardous materials have not occurred (unless all spilled material has been removed).
- Water from the routine external washing of buildings, conducted without the use of detergents.
- Springs and other non-contaminated groundwater.
- Water from foundation or footing drains where flows are not contaminated with process materials such as solvents.

The City of Baton Rouge South WWTP certifies that, by signing this Plan, the non-permitted storm water outfall flow has been observed and evaluated for the presence of non-storm water discharges and that any non-storm water discharges not covered by the facility's existing permit are either to be eliminated or planned to be permitted.

3.6 RISK IDENTIFICATION AND SUMMARY OF POTENTIAL POLLUTANT SOURCES

Based on the information obtained during the field investigation and site assessment phase, the following were identified as potential pollutant sources at the facility that pose a risk of contaminating storm water discharges to the Mississippi River or Bayou Fountain.

The information contained in **Section 3.2** of this SWP3 documents the South WWTP's assessment of the potential pollutants and pollutant sources within each storm water drainage area of the facility.

4.0 STORM WATER POLLUTION PREVENTION BEST MANAGEMENT PRACTICES AND CONTROLS

The focus of the following sections of the SWP3 will be to document the BMPs and other storm water management practices and controls identified to be implemented at the facility in order to minimize and/or prevent the discharge of potential pollutants in storm water runoff from the facility. BMPs are measures implemented to prevent or mitigate pollution from any type of activity. Based upon the potential pollutant sources and storm water/non-storm water discharges identified in **Sections 3.1 through 3.4**, South WWTP has selected the following BMPs for implementation at the site and documentation in the SWP3.

4.1 GOOD HOUSEKEEPING

Measures designed to maintain a clean, orderly, and safe work environment also contribute to the prevention of potential pollutant sources from coming into contact with and impacting storm water runoff. Good housekeeping also reduces the potential for accidental spills caused by mishandling of significant materials, thereby enhancing the safety of plant personnel. South WWTP is committed to following good housekeeping measures.

General order and cleanliness will be practiced throughout the facility site. Each employee will be responsible for keeping work areas clean and orderly. All debris and waste materials must be properly disposed of in designated waste receptacles for subsequent disposal. All tanks, equipment, parts, dumpsters, trash bins, petroleum products, chemical solvents, detergents, or other materials exposed to storm water will be maintained in a manner which prevents contamination of storm water by pollutants.

In the event of a spill, all spilled product and spilled wastes will be immediately cleaned up and disposed of according to all applicable regulations. The use of detergents, emulsifiers, or dispersants to clean up spilled product is prohibited except where necessary to comply with state or federal safety regulations (i.e., requirement for non-slippery work surface). In all such cases, initial cleanup will be done by physical removal and chemical usage will be minimized.

Garbage is disposed of approximately once per week at the South WWTP. A monthly storm water facility inspection is conducted for all solids handling, storage or disposal areas, and access roads to identify potential storm water contamination sources.

Minimize Exposure

Measures are taken to prevent th e spill or release of biosolids by providing a washdown area for sludge trailers and equipm ent. The liquid from this washdown area flows to the headworks of the plant where it enters the incoming wastewater stream. Cleaning solven t and equipment fuels are stored indoors in properly marked containers.

Maintenance

All equipment is maintained according to manufacturer specifications, such procedures are kept in a m aintenance log book docum enting person(s) performing such, dates, tim e, parts replaced/repaired, hours on equipm ent, and any m alfunctions or unusual wear noticed on such equipment. The maintenance schedule may be altered to suit the individual equipment being used should the equipm ent be subjecte d to longer, harsher, or any other undue stresses/uses that would be considered abnor mal. Routine m aintenance will prevent and/or detect any m alfunctions before they occur. In the event of an unforeseen m alfunction or breakdown, the equipm ent will be repaired imm ediately by qua lified personnel, either in-house, or by an outside vendor before such equipment is placed back in service.

LPDES Non-Numeric Effluent Limits

In addition to the visual assessm ents and numerical limits for Biological Oxygen Dem and (BOD), Total Suspended Solids (TSS) and Fecal Coliform, no non-num eric effluent lim its are required as outlin ed in the 201 8 LPDES. However, perm it requirem ents include the prohibition of non-storm water discharges, the im plementation of control m easures and employee training.

Waste, Garbage, and Floatable Debris

Waste, garbage, and floatabl e debris discharges are m inimized through the use of good housekeeping practices and a re gular refuse disposal sche dule. Garbage at the S outh WWTP is loaded into dum psters p rior to f inal disposal at the North Landf ill in Za chary, Louisiana. Digested sludge is removed from t he South WWTP daily via sludge trailers prior to d isposal at the North Landfill. In a ddition, floatable debris from the prim ary and secondary clarifiers is disposed of with the use of vacuum trucks.

Dust Generation and Vehicle Tracking of Industrial Materials

Sludge trailers are washed clean after loading so that excess sludge may be collected and transported to the plant headworks to become part of the influent wastewater stream.

4.2 SPILL PREVENTION AND RESPONSE PROCEDURES

It is South WWTP's policy that all spills/releases of significant materials with potential to impact storm water runoff from the site will be properly responded to in accordance with proper spill prevention and response measures and applicable regulations. Any materials spilled/released will be properly contained, recovered, and properly disposed of f site, as applicable, so as to prevent contamination of storm water. All significant spill incidents requiring notification to regulatory agencies must be reported in accordance with state and federal regulations.

4.3 PREVENTIVE MAINTENANCE (PM)

South WWTP has selected several BMPs that anticipate and seek to prevent potential exposures of pollutants to storm water runoff through preventive inspection and maintenance of all equipment and storm water management controls.

4.4 INSPECTIONS AND RECORDS

The outfalls are checked daily for the presence of sheen, deposits, or stains. Formal inspections are done quarterly and documented on the checklist attached in **Appendix C, Facility Quarterly Inspection Forms**.

A formal site inspection is conducted annually by one or more members of the SWP3 team as part of the required comprehensive site evaluation. All areas of the facility identified in **Section 3.2** of this plan, as well as all existing BMPs, are evaluated and inspected. Results of these inspections will be retained with the SWP3 for a period of at least three years from the date that the permit expires. The formal site inspection form is provided in **Appendix D, Annual Comprehensive Site Compliance Evaluation Report**.

4.5 EMPLOYEE TRAINING AND COMMUNICATION

Employee training will be conducted annually. This training will address such topics as spill prevention and response, good housekeeping, and material management practices, and

operations and maintenance review. Periodic reviews to explain new techniques or improved procedures are conducted as necessary. Pollution prevention training will be documented as to the date training occurred, employees present, and topics covered (see **Appendix E, Employee Training Records**).

4.6 SEDIMENT AND EROSION CONTROL

Measures will be taken to the greatest extent possible to control the amount of sediment entering and leaving the South WWTP grounds during rainfall and other storm water related events. This will be accomplished by the proper grading of sloped areas, and vegetated buffer zones as site specific conditions warrant. Erosion control will naturally be enhanced using these procedures and by the monitoring of sensitive areas. The overall and most comprehensive erosion control structures at the South WWTP are vegetated buffer zones. Other control measures such as diversion structures and silt fences shall be considered as temporary control measures used during construction, maintenance, and repair operations.

4.7 MANAGEMENT OF STORM WATER RUNOFF

The South WWTP was designed to divert, to the greatest extent possible, storm water entering the plant. Most of the precipitation entering the plant is collected in a system of storm drains then subsequently discharged into Bayou Fountain, then Bayou Manchac. In addition, approximately 15 percent of the plant's surface area consists of open tanks. Precipitation falling in these areas becomes a part of the wastewater stream.

4.8 FACILITY SECURITY

To prevent unauthorized entry and vandalism as well as protect against unintentional spills from storage areas and loading/unloading areas, a chain-linked fence with a locked gate surrounds the operations area of the facility.

5.0 STORM WATER POLLUTION PREVENTION PLAN EVALUATION AND MONITORING REQUIREMENTS

5.1 PURPOSE AND SCOPE

The South WWTP will document actions as required by this SWP3. The SWP3 team will assume all responsibility to see that documentation forms are properly completed and kept for the duration of three years. The team will conduct a comprehensive site compliance evaluation to ensure the effectiveness and accuracy of the BMPs and site information contained herein. Revisions to this plan and subsequent implementations will also be documented and directed by the team.

5.2 RECORD MAINTENANCE AND PUBLIC ACCESS

Safety data sheets will be on file for all current inventory of bulk chemicals handled at the facility. Inspections and maintenance activities regarding storm water pollution prevention measures and controls will be documented, and records of such activities will be retained on site.

This SWP3 and all related documentation will be made available to all regulatory agencies upon request. The general public may review the plan and all related documentation by submitting a request through the Director of USEPA, Region VI or the Assistant Secretary of the LDEQ, Office of Environmental Services.

5.3 STORM WATER SAMPLING AND ANALYSIS

In accordance with the storm water monitoring requirements contained in LPDES Permit No. LA0036412, the South WWTP is required to conduct monthly, quarterly, semiannual, and annual monitoring of the permitted outfalls. Quantitative analytical data must be collected and submitted by the 15 th day of the month following the sampling period. Included in the table below are the parameters and limitations for each pollutant at every permitted outfall.

TABLE 5-1
DAILY SAMPLING OUTFALLS, PARAMETERS, AND LIMITATIONS

Outfall	Parameter	Limitation
Outfall 001	Flow N/A	
	pH	6 - 9 s.u.
	Biological Oxygen Demand (BOD)	Monthly Average: 15,511 lb/day, 30 mg/L Weekly Average: 45 mg/L
	Total Suspended Solids (TSS)	Monthly Average: 13,511 lb/day, 30 mg/L Weekly Average: 45 mg/L
	Total Residual Chlorine (TRC)	* Daily Max : 1.17 mg/L
	Fecal Coliform (colonies/100mL)	Monthly Average: 200 Weekly Average: 400

TABLE 5-2
QUARTERLY SAMPLING OUTFALLS, PARAMETERS, AND LIMITATIONS

Outfall	Parameter	Limitation
Outfall 001	Biotoxicity Testing	N/A

TABLE 5-3
SEMIANNUAL SAMPLING OUTFALLS, PARAMETERS, AND LIMITATIONS

Outfall	Parameter	Limitation
Outfall 001	Toxic Substances	N/A

All sampling and analytical data required will be retained on site for at least three years beyond the date the records were generated. A summary of LPDES sampling requirements is included in **Appendix A, LPDES Permit No. LA0036412**.

5.4 ANNUAL COMPREHENSIVE SITE COMPLIANCE EVALUATION REPORT

One or more members of the SWP3 team must conduct a thorough site compliance evaluation once each calendar year to evaluate this SWP3 and verify full compliance with LPDES Permit No. LA0036412. A more stringent schedule will be implemented if necessary to achieve compliance. Reports should be retained in this SWP3 in **Appendix**

D, Annual Comprehensive Site Compliance Evaluation Report , for at least three years from the date of origin.

Part I of the Annual Comprehensive Site Compliance Evaluation Form

Part I of the Annual Comprehensive Site Com pliance Evaluation Form (see **Appendix D**) shall be used to docum ent observations, inspections, review, and verification of measures/controls implemented to reduce/prevent pollution of storm water runoff from the Facility. The evaluation will consist of the following:

- Inspection of the loading/unloading ar eas and storage areas described in **Section 3.2** of this docum ent for evidence of, or pot ential for, pollutants entering the drainage system;
- Inspection of exposed significa nt m aterials described in **Section 3.2** of this document for evidence of, or potential for, pollutants being released;
- Inspection/observation of storm wat er m anagement m easures and structures and structural pollution prevention BMPs described in **Sections 4.1 through 4.8** of this document to ensure they are adequate, im plemented in accordance with the perm it, operational, and effective;
- Inspection/observation of sedim ent contro ls and erosion controls described in **Section 4.6** of this docum ent to ensure the y are adeq uate, im plemented in accordance with the permit, operational, and effective;
- A review of storm water m anagement practices described in **Sections 3.2 and 4.1 through 4.8** of this document; and
- A review of em ployee training and communication described in **Section 4.5** of this document.

Part II of the Annual Comprehensive Site Compliance Evaluation Form

Based on P art I of the Annual Comprehens ive Site Com pliance Evaluation Form, an evaluation o f the ef fectiveness of c ontrols, measures, and m anagement practice s will b e made to determ ine whether m odified, additi onal, or different controls, m easures, or management practices are needed. This w ill be docum ented in Part III of the Annual Comprehensive Site Compliance Evaluation Form (**Appendix D**).

Part III of the Annual Comprehensive Site Compliance Evaluation Form

Upon completion of Parts I and II of each Annual Comprehensive Site Compliance Evaluation Form, a report must be prepared that summarizes the following (the report is Part III of the Annual Comprehensive Site Compliance Evaluation Form – see **Appendix D**):

- Scope of the inspection/evaluation;
- Personnel conducting and date(s) of the inspection/evaluation;
- Major observations relating to implementation of the SWP3;
- Actions taken or to be taken to revise the SWP3 and to implement the associated changes;
- List of incidents of non-compliance;
- Documentation of provisions to ensure the summary report will be retained as part of the facility SWP3, and will be retained for at least three years after the report was generated;
- If incidents of non-compliance are not found, certification that the facility is in compliance with the SWP3 Plan and their LPDES permit, and certification of the verity of the comprehensive site compliance evaluation and summary report; and
- If incidents of non-compliance are found, certification of (1) the verity of the document, and (2) if necessary, intent to revise the SWP3 and/or implement any corrective actions in a timely manner.

5.5 SWP3 REVISION AND SUBSEQUENT IMPLEMENTATION

As a result of each comprehensive site compliance evaluation for which incidents or situations of non-compliance are determined, the following revisions must be included in the SWP3 as needed:

- The description in the plan of additional or new potential pollution sources not previously addressed and pollution prevention measures and controls necessary must be revised within 30 days after the completion of the comprehensive site evaluation.

- Changes in procedural operations must be implemented at the site in a timely manner for nonstructural measures and controls and not to exceed more than 12 weeks after completion of the comprehensive site evaluation.
- Pollution prevention measures that require construction of structural controls are allowed up to three years to implement.

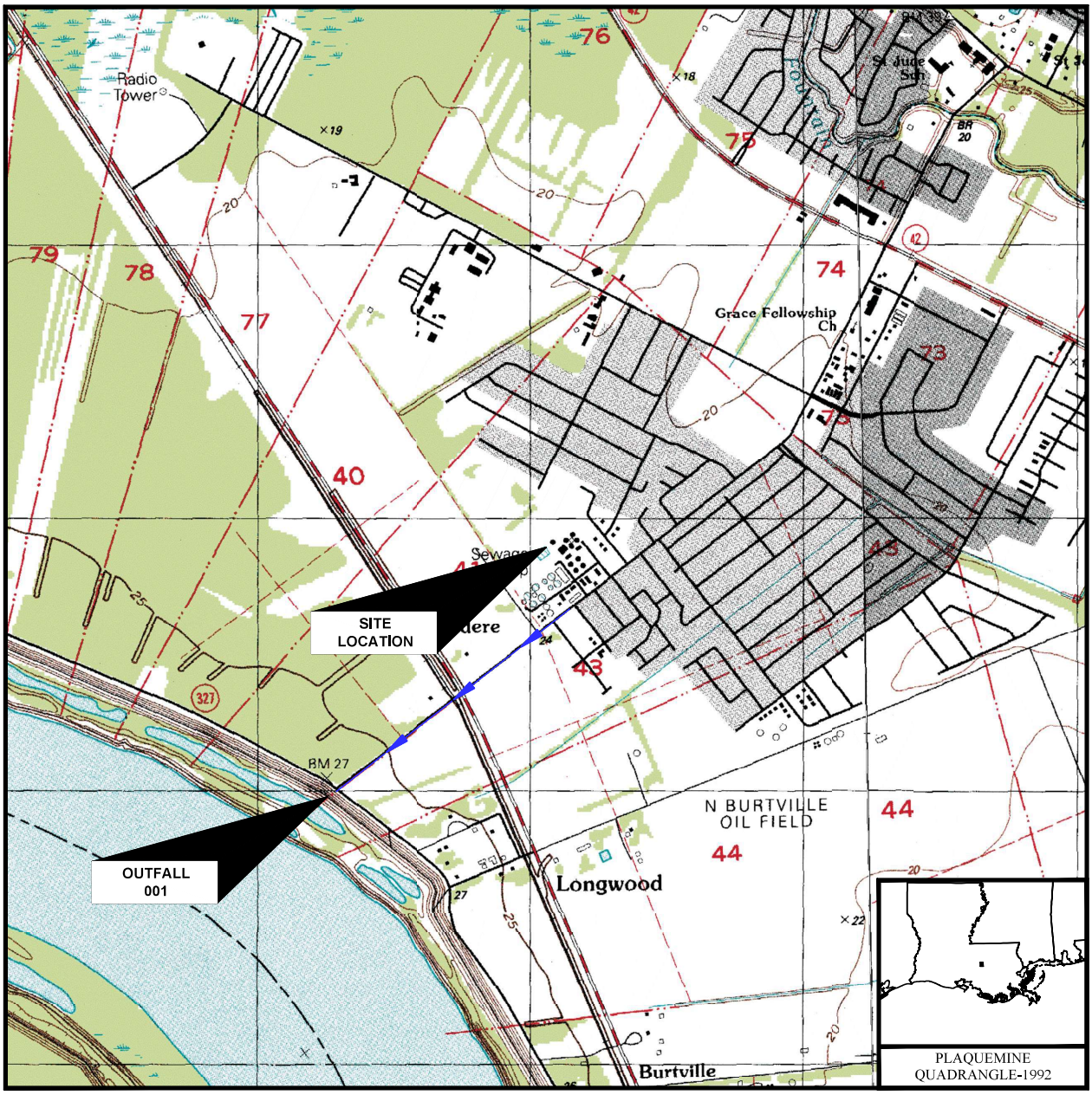
Documentation of revisions to the SWP3 should be retained in **Appendix F, Revisions to the Storm Water Pollution Prevention Plan**.

5.6 CERTIFICATION AND SIGNATORY AUTHORITY

South WWTP has initially certified that the SWP3 is accurate and complete to the best of their knowledge. The SWP3 certification is located in **Appendix G, Storm Water Pollution Prevention Plan Certification**.

Signature requirements apply to the initial certification of the SWP3 (**Appendix G**), the initial certification on non-storm water discharges (**Appendix B**), and for each Annual Comprehensive Site Compliance Evaluation (**Appendix D**). All certifications must be made with the signature of (1) a responsible corporate officer (*i.e.* president, vice president, secretary, treasurer, etc.), (2) a manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales exceeding $25 million if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures (as defined in Part III, Section D.10 of the LPDES Permit No. LA0036412), or (3) by a duly authorized representative of that person. Such authorization requires a written submittal to the LDEQ (see Part III, Section D.10.b of the LPDES Permit in **Appendix A**).

FIGURES



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PPM CONSULTANTS, INC. www.ppmco.com		CITY OF BATON ROUGE AND EAST BATON ROUGE PARISH **SOUTH WASTEWATER TREATMENT PLANT** 2850 GARDERE LANE BATON ROUGE, LOUISIANA	SITE LOCATION MAP
DRAWN BY: BWH	DRAWN DATE: 04/28/16		FIGURE NUMBER 1
PROJECT NUMBER: 55098004	BILLING GROUP: SOUTH		

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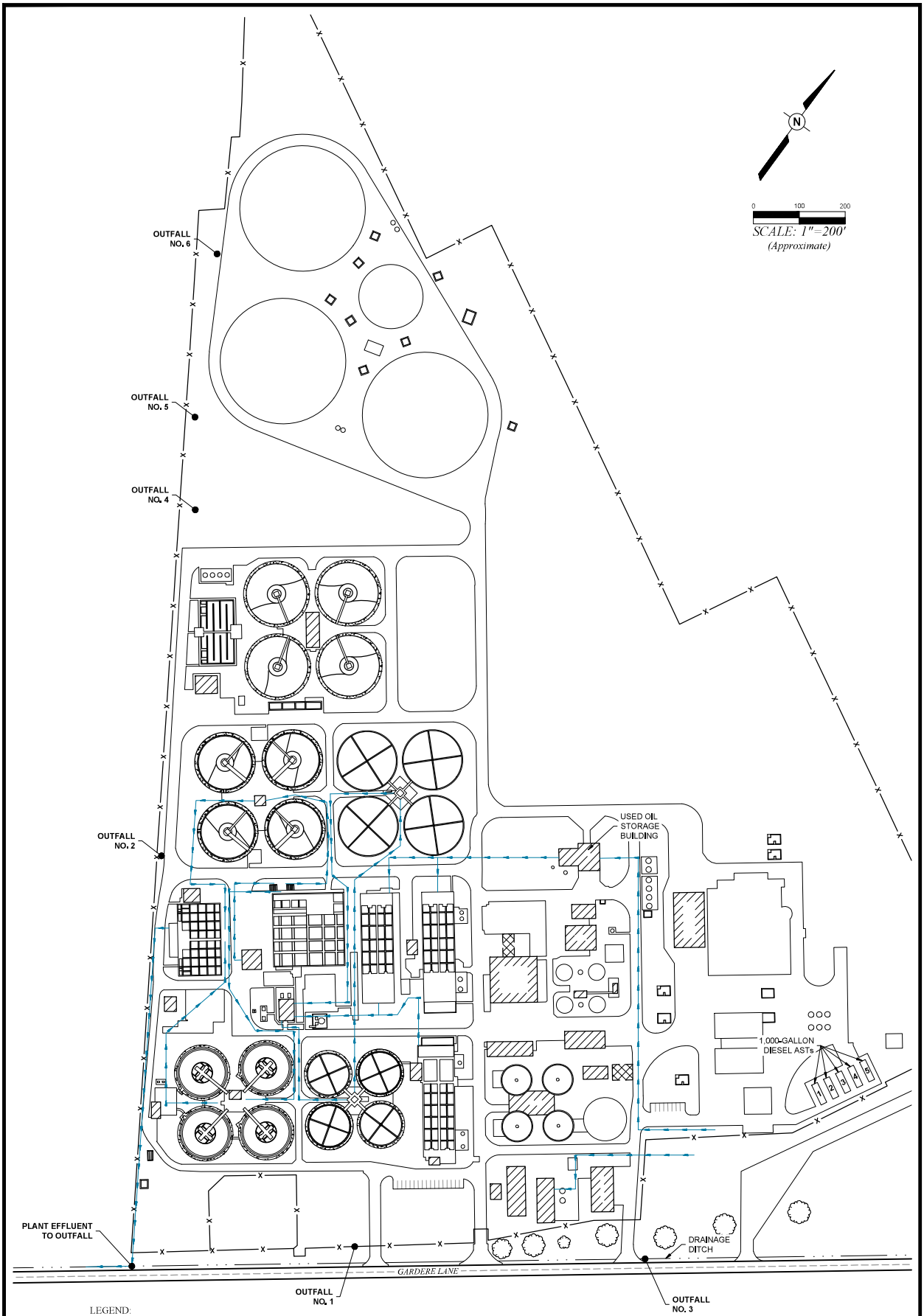

PPM CONSULTANTS, INC. www.ppmco.com	
DRAWN BY: BWH	DRAWN DATE: 04/28/16
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CITY OF BATON ROUGE AND EAST BATON ROUGE PARISH
SOUTH WASTEWATER TREATMENT PLANT
2850 GARDERE LANE
BATON ROUGE, LOUISIANA

SITE MAP

FIGURE NUMBER 2

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Appendix C

PPE Program

WASTEWATER TREATMENT PLANTS

PERSONAL PROTECTIVE EQUIPMENT PROGRAM

I. PURPOSE

The Personal Protective Equipment (PPE) program has been developed in an effort to guide the use of PPE by employees to prevent injuries.

PPE is used to reduce or minimize physical injuries including the exposure or contact to chemical or biological agents. Hazards shall be first mitigated by engineering and administrative controls, then by the use of PPE.

II. RESPONSIBILITIES

A. Management Responsibility

1) Management has overall responsibility for the implementation of the program by allocating adequate resources, assigning authority and assuring accountability.
2) The program administrator shall, perform PPE hazard analyses, conduct training, audit proper use of PPE and revise the program as necessary. The program administrator is the Office of Workforce Development.

B. Employee Responsibility

1) Employees shall follow written and verbal directives regarding use, cleaning and maintenance of PPE.
2) Consult his/ her supervisor if there is any doubt regarding the proper use of PPE or if new hazards are present that PPE does not address.
3) Employees found in violation of the PPE Program shall be disciplined per "The Rules Governing Employees in the Classified Service".

III. REQUIREMENTS

A. Requirements for protective equipment are specified in this section, including when and under what circumstances this equipment must be worn within the protective perimeter of the treatment plants.
B. **Unless otherwise specified in writing, the "Plant Operating Area" includes the outdoor areas within the fence line past the Administration Building**.
C. **All persons entering the plant operating area must, at a minimum, be wearing hard hat, safety glasses, hearing protection, and ASTM compliant safety shoes per specifications in Section (IV).** Persons traveling throughout the plant in licensed motor vehicles are not required to wear the minimum safety equipment, but must have this equipment readily accessible for use during an emergency.
D. Exceptions to the above rules are as followed:
    1) Hard hats are not required inside office buildings, the control rooms or shop areas.
    2) Safety glasses are not required inside office buildings and control rooms.
    3) Hearing protection use shall be required in specifically marked areas. Hearing protection shall be possessed at all times.

4) Visitors formally touring the facility shall be required to wear closed toe, sturdy leather shoes instead of safety shoes while accompanied by plant personnel.
    a. Anyone performing work activities is not considered a visitor as described in paragraph (D4).

IV. PPE SPECIFICATIONS

A. Eye Protection

1) All plant visitors shall be required to wear eye protection appropriate to the area being visited.
2) Eye protection shall be a minimum **ANSI Z87.1** rating.
3) Safety glasses must be worn in the lab areas at all times.
4) Many jobs require eye protection exceeding safety glasses**.**
5) <u>The following jobs require goggles:</u>
    a. Breaking any lines which could contain pressure. (Face shields are required for corrosive chemicals)
    b. Performing laboratory work involving weak acids or weak caustics
    c. Performing work in chemical diked areas

B. Hearing Protection

1) Hearing protection is required to be possessed in all areas of the plant except the administration building, laboratory and maintenance buildings.
2) Hearing protection may be required in these areas if specific work is being performed which is 85 dBA or greater.
3) Only hearing protection that offers a noise reduction rating (NRR) of 20 dB or above shall be purchased.
4) Management shall ensure areas are marked to indicate where hearing protection is required throughout the plant.

C. Safety Headgear

1) Approved safety hard hats shall be worn by all personnel while in the plant operating areas. Hardhats shall be **ANSI Z89.1-2009 E** compliant**. No conductive hardhats shall be permitted.**
2) Face shields, affixed to hardhats, shall be used for work specified in the PPE matrix (appendix A).

D. Safety Footwear

1) Safety footwear shall be ASTM F2413 compliant and in good condition.

E. Clothing

1) High visibility PPE is required for entering plant construction areas. ANSI 107 Class 1 high visibility apparel shall be required inside the plant during construction.

2) For work outside the plant, on the right-of-way, high visibility apparel rated ANSI 107 Class 2 shall be required.
    a. Working in the right-of-way above 50 MPH shall require Class 3 high visibility apparel.
3) Clothing contaminated with chemicals or sewage shall be removed immediately to minimize exposure and injury. An exposure report shall be filled out documenting the event.
4) Fire Retardant Clothing
    a. Fire retardant clothing (FRC) shall be worn by Plant Electricians, Plant Instrument Technicians and associated trainees at all times.
    b. **Hazard Rating Class (HRC) 2** is the minimum rating for FRC used.
    c. Arc flash suits shall be used per **NFPA 70E.**
    d. FRC High visibility PPE shall be provided for Plant Electricians and Plant Instrument Technicians

F. Hand Protection

1) Gloves shall be worn at all times when performing operations that expose the fingers to cuts, scrapes, bruises and chemical/ sewer exposure.

G. Fall Protection

1) Harnesses are required and shall be tied off for anyone working 6 feet or higher above the ground when not protected by a railing or on a complete platform or structure.
2) Employees in personnel lifts shall wear safety harness and secure the lanyard while aloft.
3) Discard any harness or lanyard that has been subject to impact forces.
4) Lanyards should be kept as short as possible.
5) Inspect harness for defects, wear and deterioration; remove from service if faulty conditions are present.
6) Tie off to a proper anchor point, if you doubt the quality of the anchorage, do not use it.

V. HYGIENE

A. PPE shall be kept clean, unsoiled and disinfected as much as possible.
B. Disinfecting stations shall be provided to clean PPE with a weak bleach solution or an equivalent cleaning substance.
C. PPE not able to be cleaned or excessively worn shall be discarded.

VI. TRAINING

A. All employees shall be trained in the use of PPE and basic principles. Training shall be provided as needed by subject matter experts.
B. Refresher trainings shall be conducted wherever there is a change in job assignment, process change, procedure change or a deficiency is identified.
C. Training shall be documented and records retained by management.

VII. PROGRAM INSPECTION

A. Periodic inspections shall be conducted by the program administrator to ensure all aspects of the PPE Program are being followed. The inspections shall include auditing plant personnel for program compliance.
B. Upon finding areas of the program that need improvement, revisions shall be made. Training regarding program changes shall be facilitated promptly.

VIII. REFRENCES

OSHA STANDARD

29 CFR 1910.132 Personal Protective Equipment, General requirements.

Wastewater Treatment PPE Matrix (Appendix A)

Type of Work/ Job Description	Gloves	Face	Head	Body	Foot	Eyes	Hearing	Notes
Gas powered cart operator	NA	NA	NA	Uniform	Safety shoe	Safety glasses	NA	
Backhoe operator	NA	NA	NA	Uniform	Safety shoe	Safety glasses	NA	
Tractor operator	NA	NA	NA	Uniform	Safety shoe	Safety glasses	NA	
Class A Truck operator	Supported chemical resistant	NA	Hardhat	Uniform	Safety shoe	Safety glasses	NA	
Crane truck operator	Leather	NA	Hardhat	Uniform	Safety shoe	Safety glasses	NA	
Vacuum truck operator	Supported chemical resistant	Face shield	Hardhat	Uniform or chemical resistant suit	Safety shoe	Safety glasses	Required	
Pressure washing	Supported chemical resistant	Face shield	Hardhat	Uniform or chemical resistant suit	Safety shoe	Safety glasses or goggles	Required	
Sewer spill clean up	Supported chemical resistant	Face shield	Hardhat	Uniform or chemical resistant suit	Safety shoe	Safety glasses or goggles	Required in specified areas	
Wastewater sampling	unsupported chemical resistant	NA	Hardhat	Uniform	Safety shoe	Safety glasses or goggles	Required in specified areas	
Operations visual inspection	NA	NA	Hardhat	Uniform	Safety shoe	Safety glasses	Required in specified areas	
Electrical / Inst. Visual inspection	NA	NA	Hardhat	FRC uniform	Safety shoe	Safety glasses	Required in specified areas	
Maintenance visual inspection	NA	NA	Hardhat	Uniform	Safety shoe	Safety glasses	Required in specified areas	
General labor work	Supported chemical resistant or leather	NA	Hardhat	Uniform or chemical resistant suit	Safety shoe	Safety glasses	Required in specified areas	
Initial Line Break Chemical areas	Supported chemical resistant	Face shield	Hardhat	Chemical resistant suit	Safety shoe	Goggles	Required in specified areas	
Loading/ Unloading Chemicals	Supported chemical resistant	Face shield	Hardhat	Uniform or chemical resistant suit	Safety shoe	Goggles	Required in specified areas	
Chemical dike area maintenance	Supported chemical resistant	Face shield	Hardhat	Uniform or chemical resistant suit	Safety shoes or Chemical resistant boots	Goggles	Required in specified areas	

Chemical Dike Areas (H2SO4, NaOCl, NaOH) (Appendix A -2)

Job Description/ Type	Chemical Gloves/ Double Protection	Face	Neck/ Head	Body	Foot	Eyes	Respirator	Hearing
Workforce non-E&I General Work			Hardhat with goggles		Safety Shoes	Safety Glasses or Goggles		Ear Plugs
E&I General Work <480VAC			Hardhat with goggles	FRC HRC 2	Safety Shoes	Safety Glasses or Goggles		Ear Plugs
Initial Line Break Chemical areas	NSK 24 & Nitrile Gloves	Face shield	Chemical suit hood & hardhat	ChemMax2 , ChemTape	PVC Chem Resistant Boot /Tingley 93245	Goggles	*1	
Loading/ Unloading Chemicals	NSK 24 & Nitrile Gloves	Face shield	Chemical suit hood & hardhat	ChemMax2 , ChemTape	PVC Chem Resistant Boot /Tingley 93245	Goggles	*1	
Spill Response	NSK 24 & Nitrile Gloves	Face shield	Chemical suit hood & hardhat	ChemMax2 , ChemTape	PVC Chem Resistant Boot /Tingley 93245	Goggles	*1 or *2	
Visual Inspection Chemical area			Hardhat		Safety Shoes	Goggles		Ear Plugs

Notes

PPE Matrix only applicable if Temperatures are BELOW 120° F

*1 If irritation occurs half face or full face Air Purifying Respirator (APR) with appropriate cartridge

*2 SCBA or Supplied Air Respirator is required for fuming, decomposing or reacting chemicals

Sulfuric acid is highly corrosive at 93% and should be periodically washed off of PPE to prevent premature breakthrough

ChemTape Sulfuric Acid breakthrough >480 Min

ChemTape Sodium Hydroxide breakthrough >480 Min

NSK 24 Gloves Sulfuric Acid breakthrough 180 Min

NSK 24 Gloves Sodium Hydroxide breakthrough >480 Min

ChemMax2 Chemical Suit Sulfuric Acid breakthrough >480 Min

ChemMax2 Chemical Suit Sodium Hydroxide breakthrough >480 Min

PPE Supply List

Lakeland Protective Wear - ChemMax2 (C72150) Chemical Suit

Showa Best Glove - NSK 24 (NSK24) Chemical Resistant Glove

Tingley Premier Knee Boot (93245) Steel Toe Chemical Resistant Boot

Kappler ChemTape (99402-YW)

Bullard Goggle clips X 3 (GC100)

Pyramex Hardhat Adapter (HHAAD/HHAAW)

CITY-PARISH DEPARTMENTAL MEMORANDUM

November 6, 2018

TO: Wastewater Treatment Plant Division

FROM: Justin Sharper, Professional Engineer IV

SUBJECT: Wastewater Treatment Plant – PPE Program Addendum

PRIORITY: **High**

Please note the following addition to the "Wastewater Treatment PPE Matrix (Appendix A)," as included in the current "Wastewater Treatment Plants – Personal Protective Equipment Program."

Type of Work/Job Description	PPE Requirement
Mowing / Weed eating	Eyes- Safety Goggles

Thanks in advance for your corporation.